

Illegal content risk assessment

Service name:	I3Italy C.I.C.
Service type:	Website, social media pages (Facebook, Instagram, Whatsapp), in-person events and virtual helpdesk
Completion date:	14th March 2025
Next review/update date:	13th March 2026 or before.
Reason for review:	First draft
Completed by:	Cesare G. Ardito, Director
Named person responsible for the risk assessment:	Cesare G. Ardito, Director
Approved by (governance and accountability channels):	Board of directors

Step 1: U2U and Search - Risk Profiles and risk factors

U2U service Risk Profile and risk factors

1. Is your service any of these types?

Tick all that apply.

	Social media service
	Messaging service
	Gaming service
	Adult service
	Discussion forum or chat room
	Marketplace or listing service
	File-sharing or file storage service
X	None of the above

2. Do child users access some or all of the service?

Yes

3. Does your service include any of these user identification functionalities?

Tick all that apply.

X	User profiles
X	Anonymous user profiles or users without accounts
	None of the above

4. Does your service include any of these user networking functionalities?

Tick all that apply.

	Users can connect with other users
	Users can form closed groups or send group messages
X	None of the above

5. Does your service include any of these user communication functionalities?

Tick all that apply.

	Livestreaming (either open or closed channels)
	Direct messaging (including ephemeral direct messaging)
	Encrypted messaging
X	Commenting on content

	Posting or sending images or videos (either open or closed channels)
	Posting or sending location information
	Re-posting or forwarding content
	None of the above

6. Does your service allow users to post goods and services for sale?

No

7. Does your service include any of the following functionalities that allow users to find or encounter content? Tick all that apply.

	Searching for user-generated content
X	Hyperlinking
	None of the above

8. Does your service use content or network recommender systems?

No

Search service Risk Profile and risk factors

1. Is your service any of the following service types?

	General search service (including downstream general search service)
X	Vertical search service

2. Do child users access your service?

Yes

3. Does your service have any of the following functionalities?

Tick all that apply.

	Provide users with search predictions or suggestions
	Allow users to search for photographs, videos or visual images

Step 2: Assess the risk of harm

Terrorism

Risk level:

Negligible

Risk factors considered:

Commenting on content.

Additional characteristics considered:

None.

Existing controls considered:

All comments on the website are moderated before being published.

Social media comments are under the safeguards of the services provided by Meta.

User profiles are under the safeguards of the services provided by Wordpress.com.

Evidence:

The content moderation system on the website ensures that nothing can be published without manual approval by staff.

Meta's content moderation systems are deemed by Ofgem to be within the scope of the OSA. Furthermore, staff can delete or hide content approved by Meta if necessary, and pages are monitored on a daily basis.

Child sexual exploitation and abuse (CSEA)

Risk level:

Negligible

Risk factors considered:

Commenting on content.

Additional characteristics considered:

None.

Existing controls considered:

All comments on the website are moderated before being published.

Social media comments are under the safeguards of the services provided by Meta.

User profiles are under the safeguards of the services provided by Wordpress.com.

Evidence:

The content moderation system on the website ensures that nothing can be published without manual approval by staff.

Meta's content moderation systems are deemed by Ofgem to be within the scope of the OSA. Furthermore, staff can delete or hide content approved by Meta if necessary, and pages are monitored on a daily basis.



Image-based child sexual abuse material (U2U only)

Risk level:

Negligible

Risk factors considered:

There are no risk factors, as U2U communication is not possible through our service.

Additional characteristics considered:

None.

Existing controls considered:

Social media comments and DMs are under the safeguards of the services provided by Meta..

Evidence:

Meta's DM moderation systems are deemed by Ofgem to be within the scope of the OSA.



Child sexual abuse material URLs (U2U only)

Risk level:

Negligible

Risk factors considered:

There are no risk factors, as U2U communication is not possible through our service.

Additional characteristics considered:

None.

Existing controls considered:

Social media comments and DMs are under the safeguards of the services provided by Meta..

Evidence:

Meta's DM moderation systems are deemed by Ofgem to be within the scope of the OSA.



Grooming (Child sexual abuse and exploitation) (U2U only)

Risk level:

Negligible

Risk factors considered:

There are no risk factors, as U2U communication is not possible through our service.

Additional characteristics considered:

None.

Existing controls considered:

Social media comments and DMs are under the safeguards of the services provided by Meta..

Evidence:

Meta's DM moderation systems are deemed by Ofgem to be within the scope of the OSA.

Hate

Risk level:

Negligible

Risk factors considered:

Commenting on content.

Additional characteristics considered:

None.

Existing controls considered:

All comments on the website are moderated before being published.

Social media comments are under the safeguards of the services provided by Meta.

User profiles are under the safeguards of the services provided by Wordpress.com.

Evidence:

The content moderation system on the website ensures that nothing can be published without manual approval by staff.

Meta's content moderation systems are deemed by Ofgem to be within the scope of the OSA. Furthermore, staff can delete or hide content approved by Meta if necessary, and pages are monitored on a daily basis.

Harassment, stalking, threats and abuse offences

Risk level:

Negligible

Risk factors considered:

Commenting on content.

Additional characteristics considered:

None.

Existing controls considered:

All comments on the website are moderated before being published.

Social media comments are under the safeguards of the services provided by Meta.

User profiles are under the safeguards of the services provided by Wordpress.com.

Evidence:

The content moderation system on the website ensures that nothing can be published without manual approval by staff.

Meta's content moderation systems are deemed by Ofgem to be within the scope of the OSA. Furthermore, staff can delete or hide content approved by Meta if necessary, and pages are monitored on a daily basis.

Controlling or coercive behaviour

Risk level:

Negligible

Risk factors considered:

Commenting on content.

Additional characteristics considered:

None.

Existing controls considered:

All comments on the website are moderated before being published.

Social media comments are under the safeguards of the services provided by Meta.

User profiles are under the safeguards of the services provided by Wordpress.com.

Evidence:

The content moderation system on the website ensures that nothing can be published without manual approval by staff.

Meta's content moderation systems are deemed by Ofgem to be within the scope of the OSA. Furthermore, staff can delete or hide content approved by Meta if necessary, and pages are monitored on a daily basis.

Intimate image abuse

Risk level:

Negligible.

Risk factors considered:

Commenting on content with links to external services hosting images.

Additional characteristics considered:

None.

Existing controls considered:

All comments on the website are moderated before being published.

Social media comments are under the safeguards of the services provided by Meta.

User profiles are under the safeguards of the services provided by Wordpress.com.

Evidence:

The content moderation system on the website ensures that nothing can be published without manual approval by staff.

Meta's content moderation systems are deemed by Ofgem to be within the scope of the OSA. Furthermore, staff can delete or hide content approved by Meta if necessary, and pages are monitored on a daily basis.

Extreme pornography offence

Risk level:

Negligible

Risk factors considered:

Commenting on content with links to external services hosting media.

Additional characteristics considered:

None.

Existing controls considered:

All comments on the website are moderated before being published.

Social media comments are under the safeguards of the services provided by Meta.

User profiles are under the safeguards of the services provided by Wordpress.com.

Evidence:

The content moderation system on the website ensures that nothing can be published without manual approval by staff.

Meta's content moderation systems are deemed by Ofgem to be within the scope of the OSA. Furthermore, staff can delete or hide content approved by Meta if necessary, and pages are monitored on a daily basis.

Sexual exploitation of adults

Risk level:

Negligible

Risk factors considered:

Commenting on content.

Additional characteristics considered:

None.

Existing controls considered:

All comments on the website are moderated before being published.

Social media comments are under the safeguards of the services provided by Meta.

User profiles are under the safeguards of the services provided by Wordpress.com.

Evidence:

The content moderation system on the website ensures that nothing can be published without manual approval by staff.

Meta's content moderation systems are deemed by Ofgem to be within the scope of the OSA. Furthermore, staff can delete or hide content approved by Meta if necessary, and pages are monitored on a daily basis.

Human trafficking

Risk level:

Negligible

Risk factors considered:

Commenting on content.

Additional characteristics considered:

None.

Existing controls considered:

All comments on the website are moderated before being published.

Social media comments are under the safeguards of the services provided by Meta.

User profiles are under the safeguards of the services provided by Wordpress.com.

Evidence:

The content moderation system on the website ensures that nothing can be published without manual approval by staff.

Meta's content moderation systems are deemed by Ofgem to be within the scope of the OSA. Furthermore, staff can delete or hide content approved by Meta if necessary, and pages are monitored on a daily basis.

Unlawful immigration

Risk level:

Low

Risk factors considered:

Commenting on content.
Guidance articles.
Targeting of vulnerable users by individuals.

Additional characteristics considered:

None.

Existing controls considered:

All comments on the website are moderated before being published.
Social media comments are under the safeguards of the services provided by Meta.
User profiles are under the safeguards of the services provided by Wordpress.com.
Users are warned that the content of the website does not constitute legal advice and to only trust official, registered advisors.
We do not approve comments containing contact details or protected identity information on our website.
Articles on immigration only aim to give “legal support” and “signposting” and are written and carefully vetted by experts on the sector, internally and externally, refraining from any kind of tailored advice, linking to official resources and signposting to vetted organisations.

Evidence:

The content moderation system on the website ensures that nothing can be published without manual approval by staff.
Meta’s content moderation systems are deemed by Ofgem to be within the scope of the OSA. Furthermore, staff can delete or hide content approved by Meta if necessary, and pages are monitored on a daily basis.
No kind of “legal advice” provision can take place on our services due to internal policies. No misunderstandings or complaints were recorded between 2019 and the date of this review.
Every caution is taken to warn users, and while having received no complaints or information on the matter, we cannot exclude that users commenting on our content may be targeted by criminals, for instance through their Meta profiles or finding them through their nickname or with other information.



Fraud and financial services offences

Risk level:

Low

Risk factors considered:

Commenting on content.
Guidance articles.
Targeting of vulnerable users by individuals.

Additional characteristics considered:

None.

Existing controls considered:

All comments on the website are moderated before being published.
Social media comments are under the safeguards of the services provided by Meta.
User profiles are under the safeguards of the services provided by Wordpress.com.
Users are warned that the content of the website does not constitute financial advice and to only trust official, registered advisors.
We do not approve comments containing contact details or protected identity information on our website.
Articles on immigration only aim to give “support” and “signposting” and are written and carefully vetted by experts on the sector, internally and externally, refraining from any kind of tailored advice, linking to official resources and signposting to vetted organisations.

Evidence:

The content moderation system on the website ensures that nothing can be published without manual approval by staff.
Meta’s content moderation systems are deemed by Ofgem to be within the scope of the OSA. Furthermore, staff can delete or hide content approved by Meta if necessary, and pages are monitored on a daily basis.
No kind of “financial advice” provision can take place on our services due to internal policies. No misunderstandings or complaints were recorded between 2019 and the date of this review.
Every caution is taken to warn users, and while having received no complaints or information on the matter, we cannot exclude that users commenting on our content may be targeted by criminals, for instance through their Meta profiles or finding them through their nickname or with other information.

Proceeds of crime

Risk level:

Negligible

Risk factors considered:

Commenting on content.

Additional characteristics considered:

None.

Existing controls considered:

All comments on the website are moderated before being published.

Social media comments are under the safeguards of the services provided by Meta.

User profiles are under the safeguards of the services provided by Wordpress.com.

Evidence:

The content moderation system on the website ensures that nothing can be published without manual approval by staff.

Meta's content moderation systems are deemed by Ofgem to be within the scope of the OSA. Furthermore, staff can delete or hide content approved by Meta if necessary, and pages are monitored on a daily basis.

Drugs and psychoactive substances

Risk level:

Negligible

Risk factors considered:

Commenting on content.

Additional characteristics considered:

None.

Existing controls considered:

All comments on the website are moderated before being published.

Social media comments are under the safeguards of the services provided by Meta.

User profiles are under the safeguards of the services provided by Wordpress.com.

Evidence:

The content moderation system on the website ensures that nothing can be published without manual approval by staff.

Meta's content moderation systems are deemed by Ofgem to be within the scope of the OSA. Furthermore, staff can delete or hide content approved by Meta if necessary, and pages are monitored on a daily basis.

Firearms, knives and other weapons

Risk level:

Negligible

Risk factors considered:

Commenting on content.

Additional characteristics considered:

None.

Existing controls considered:

All comments on the website are moderated before being published.

Social media comments are under the safeguards of the services provided by Meta.

User profiles are under the safeguards of the services provided by Wordpress.com.

Evidence:

The content moderation system on the website ensures that nothing can be published without manual approval by staff.

Meta's content moderation systems are deemed by Ofgem to be within the scope of the OSA. Furthermore, staff can delete or hide content approved by Meta if necessary, and pages are monitored on a daily basis.

Encouraging or assisting suicide (or attempted suicide)

Risk level:

Negligible

Risk factors considered:

Commenting on content.

Additional characteristics considered:

None.

Existing controls considered:

All comments on the website are moderated before being published.

Social media comments are under the safeguards of the services provided by Meta.

User profiles are under the safeguards of the services provided by Wordpress.com.

Evidence:

The content moderation system on the website ensures that nothing can be published without manual approval by staff.

Meta's content moderation systems are deemed by Ofgem to be within the scope of the OSA. Furthermore, staff can delete or hide content approved by Meta if necessary, and pages are monitored on a daily basis.

Foreign interference offence

Risk level:

Negligible

Risk factors considered:

Commenting on content.

Additional characteristics considered:

None.

Existing controls considered:

All comments on the website are moderated before being published.

Social media comments are under the safeguards of the services provided by Meta.

User profiles are under the safeguards of the services provided by Wordpress.com.

Evidence:

The content moderation system on the website ensures that nothing can be published without manual approval by staff.

Meta's content moderation systems are deemed by Ofgem to be within the scope of the OSA. Furthermore, staff can delete or hide content approved by Meta if necessary, and pages are monitored on a daily basis.

Animal cruelty

Risk level:

Negligible

Risk factors considered:

Commenting on content.

Additional characteristics considered:

None.

Existing controls considered:

All comments on the website are moderated before being published.

Social media comments are under the safeguards of the services provided by Meta.

User profiles are under the safeguards of the services provided by Wordpress.com.

Evidence:

The content moderation system on the website ensures that nothing can be published without manual approval by staff.

Meta's content moderation systems are deemed by Ofgem to be within the scope of the OSA. Furthermore, staff can delete or hide content approved by Meta if necessary, and pages are monitored on a daily basis.



Step 3: U2U and Search - Decide measures, implement and record

Illegal content Codes of Practice measure

Description:

Individual accountable for illegal content safety duties and reporting and complaints duties.

Status:

Implemented.

Date measure takes/took effect

04/08/2023

Relevant code:

ICS A2, ICU A2

Relevant duties:

Compliance with the illegal content safety duties and the reporting and complaints duties.

Date record made:

14/03/2025

Illegal content Codes of Practice measure

Description:

ICS C1 - Having a search moderation function designed to action illegal content

Status:

Implemented.

Date measure takes/took effect

04/08/2023

Relevant code:

ICS C1

Relevant duties:

Any searchable content is hosted on the website and has therefore being subjected to prior moderation approval.

Date record made:

14/03/2025



Illegal content Codes of Practice measure

Description:

ICU C1 - Having a content moderation function to review and assess suspected illegal content

Status:

Implemented.

Date measure takes/took effect

04/08/2023

Relevant code:

ICU C1

Relevant duties:

Any searchable content is hosted on the website and has therefore being subjected to prior moderation approval.

Date record made:

14/03/2025

Illegal content Codes of Practice measure

Description:

ICU C2 - Having a content moderation function that allows for the swift take down of illegal content

Status:

Implemented.

Date measure takes/took effect

04/08/2023

Relevant code:

ICU C2

Relevant duties:

Any content hosted on the website and has therefore being subjected to prior moderation approval. For social media, we rely on Meta's content moderation systems are deemed by Ofgem to be within the scope of the OSA. Furthermore, staff can delete or hide content approved by Meta if necessary, and pages are monitored on a daily basis.

Date record made:

14/03/2025



Illegal content Codes of Practice measure

Description:

ICS D1, ICU D1 – Enabling complaints

Status:

Implemented.

Date measure takes/took effect

04/08/2023

Relevant code:

ICS D1, ICU D1

Relevant duties:

Complaints can be submitted to the email address info@i3italy.org and are handled internally.

Date record made:

14/03/2025

Illegal content Codes of Practice measure

Description:

ICU D2 – Having easy to find, easy to access and easy to use complaints systems and processes

Status:

Implemented.

Date measure takes/took effect

04/08/2023

Relevant code:

ICU D2

Relevant duties:

Complaints can be submitted to the email address info@i3italy.org which is widely publicised, and are handled internally. The complaints process is described in the terms and conditions section which is present in the footer of every page of the website.

Date record made:

14/03/2025



Illegal content Codes of Practice measure

Description:

ICS D6, ICU D8 – Appropriate action for relevant complaints about suspected illegal content

Status:

Implemented.

Date measure takes/took effect

04/08/2023

Relevant code:

ICS D6, ICU D6

Relevant duties:

Complaints can be submitted to the email address info@i3italy.org and are handled internally.

Date record made:

14/03/2025

Illegal content Codes of Practice measure

Description:

ICS D8, ICU D9 – Appropriate action for relevant complaints which are appeals – determination (services that are neither large general nor multi-risk)

Status:

Implemented.

Date measure takes/took effect

04/08/2023

Relevant code:

ICS D8, ICU D9

Relevant duties:

Complaints can be submitted to the email address info@i3italy.org and are handled internally. Appeals are prioritised. Since search is internal, most of what is recommended by the measure is outside the scope.

Date record made:

14/03/2025



Illegal content Codes of Practice measure

Description:

ICS D9, ICU D10 – Appropriate action for relevant complaints which are appeals – action following determination

Status:

Implemented.

Date measure takes/took effect

04/08/2023

Relevant code:

ICS D9, ICU D10

Relevant duties:

Complaints can be submitted to the email address info@i3italy.org and are handled internally. Appeals are prioritised. Since search is internal, most of what is recommended by the measure is outside the scope.

Date record made:

14/03/2025

Illegal content Codes of Practice measure

Description:

ICS D10, ICU D11 – Appropriate action for relevant complaints about proactive technology, which are not appeals

Status:

Implemented.

Date measure takes/took effect

04/08/2023

Relevant code:

ICS D10, ICU D11

Relevant duties:

Complaints can be submitted to the email address info@i3italy.org and are handled internally. Appeals are prioritised. Since search is internal, most of what is recommended by the measure is outside the scope.

Date record made:

14/03/2025



Illegal content Codes of Practice measure

Description:

ICS D11, ICU D12 – Appropriate action for all other relevant complaints

Status:

Implemented.

Date measure takes/took effect

04/08/2023

Relevant code:

ICS D11, ICU D12

Relevant duties:

Complaints can be submitted to the email address info@i3italy.org and are handled internally.

Date record made:

14/03/2025

Illegal content Codes of Practice measure

Description:

ICS D12, ICU D13 – Exception: manifestly unfounded complaints

Status:

Implemented.

Date measure takes/took effect

04/08/2023

Relevant code:

ICS D12, ICU D13

Relevant duties:

Complaints can be submitted to the email address info@i3italy.org and are handled internally. A response is provided to every complaint that qualifies as such, no matter how unfounded it may be.

Date record made:

14/03/2025



Illegal content Codes of Practice measure

Description:

ICS G1 – Publicly available statements: substance (all services)

Status:

Implemented.

Date measure takes/took effect

11/03/2025

Relevant code:

ICS D6

Relevant duties:

Public statements are available in a dedicated section which is linked in the footer, present on every page of the website.

Date record made:

14/03/2025

Illegal content Codes of Practice measure

Description:

ICU G1 – Terms of service: substance (all services)

Status:

Implemented.

Date measure takes/took effect

11/03/2025

Relevant code:

ICU G1

Relevant duties:

Public statements are available in a dedicated section which is linked in the footer, present on every page of the website.

Date record made:

14/03/2025



Illegal content Codes of Practice measure

Description:

ICU G3 – Terms of service: clarity and accessibility

Status:

Implemented.

Date measure takes/took effect

11/03/2025

Relevant code:

ICU G3

Relevant duties:

Public statements are available in a dedicated section which is linked in the footer, present on every page of the website and compatible with screen readers and keyboard navigation.

Date record made:

14/03/2025

Illegal content Codes of Practice measure

Description:

ICU H1 – Removing accounts of proscribed organisations

Status:

Implemented.

Date measure takes/took effect

11/03/2025

Relevant code:

ICU H1

Relevant duties:

Deletion of user profiles on our website is implemented and any problematic account would be dealt with immediately by the administrators team. Meta's content moderation systems are deemed by Ofgem to be within the scope of the OSA. We could delete content posted by accounts on our social pages, but not accounts, which would be reported to Meta for deletion.

Date record made:

14/03/2025



Step 4: U2U and Search - Report, review, and update risk assessments

Alternative measure

Recommended measure:

ICS C1 - Having a search moderation function designed to action illegal content

Alternative measure:

Only content hosted on the website can be searched through the internal search tool.

Status:

Implemented.

Relevant duties:

None.

Date measure takes/took effect

04/08/2023

Area of the service the alternative measure applies to:

Search

Demonstrate how you have had regard for section 49(5) (freedom of expression and privacy):

Any searchable content is hosted on the website and has therefore being subjected to prior moderation approval.

Date record made:

14/03/2025



Alternative measure

Recommended measure:

ICS C7 - Removing listed CSAM URLs from search results

Alternative measure:

Only content hosted on the website can be searched through the internal search tool.

Status:

Implemented.

Relevant duties:

None unless the website is flagged by CSAM (which would require much stronger action than simply removing results from the internal search).

Date measure takes/took effect

04/08/2023

Area of the service the alternative measure applies to:

Search

Demonstrate how you have had regard for section 49(5) (freedom of expression and privacy):

Any searchable content is hosted on the website and has therefore being subjected to prior moderation approval.

Date record made:

14/03/2025