

Google's general search services: Proposed Conduct Requirements

Introduction to the Consultation

28 January 2026

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The Competition and Markets Authority has excluded from this published version of the consultation document information which the CMA considers should be excluded having regard to the three considerations set out in section 244 of the Enterprise Act 2002 (specified information: considerations relevant to disclosure). The omissions are indicated by [✂]. Some numbers have been replaced by a range. These are shown in square brackets. Non-sensitive wording is also indicated in square brackets.

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1. Introduction

- 1.1 In October 2025 the Competition and Markets Authority (**CMA**) designated Google as having ‘strategic market status’ (**SMS**) in the provision of general search and search advertising (together, **general search services**).¹ The accompanying consultation documents published today set out our proposals for ‘conduct requirements’: rules applying to Google’s general search services under the UK’s digital markets competition regime.² We are consulting on these proposals and invite responses by **5pm on 25 February 2026**.

The UK’s digital markets competition regime

Strategic Market Status

- 1.2 The Digital Markets, Competition and Consumers Act 2024 (the **Act**) established the UK’s digital markets competition regime. The Act sets out a framework that is flexible and forward-looking, reflecting the dynamic nature of the digital economy and providing for intervention in a bespoke and targeted way. It gives the CMA the responsibility of assessing whether firms should be subject to the regime, and if so, whether and how rules should apply to their business.
- 1.3 The Act empowers the CMA, after conducting an investigation and public consultation, to designate a firm as having SMS. SMS designation is the gateway to the digital markets competition regime – rules can only be applied to a firm if it has been designated as having SMS in relation to a particular digital activity.³ Only the largest firms can be designated: those with turnover greater than £1 billion in the UK or £25 billion globally.

Conduct requirements

- 1.4 In designing the digital markets competition regime, the government recognised that ‘The size and presence of ‘big’ digital firms is not inherently bad’.⁴ Designation does not imply wrongdoing or entail automatic constraints on the firm’s conduct. Nor does the Act compel the CMA to impose any particular rules.

¹ [Strategic Market Status investigation into Google’s general search services: Final Decision \(SMS Decision\)](#), 10 October 2025.

² The consultation documents can be found on the [Search SMS case page](#).

³ Explanatory notes to the Act, paragraph 94; 2020 [Advice of the Digital Markets Taskforce](#), December 2020 (CMA135), paragraph 4.7.

⁴ [Government response to the consultation on a new pro-competition regime for digital markets](#), page 7.

- 1.5 Instead, reflecting the targeted nature of the digital markets competition regime, the Act gives the CMA discretion as to whether to impose rules, and if so in what form; and a clear framework to guide the exercise of that discretion.
- 1.6 Conduct requirements (**CRs**) are requirements as to how the designated firm must conduct itself in relation to the digital activity in respect of which it has SMS.⁵
- 1.7 Where the CMA has designated a firm as having SMS in respect of a digital activity, the Act imposes a duty on the CMA to keep under review: whether to impose a CR; and, in relation to any CRs it decides to impose, their effectiveness and the extent of the SMS firm's compliance.⁶
- 1.8 The Act provides that CRs must seek to achieve one or more of three **statutory objectives** in relation to 'users or potential users'⁷ of the relevant digital activity:
- (a) **Fair dealing:** that users or potential users are treated fairly and able to interact, whether directly or indirectly, with the firm on reasonable terms;
 - (b) **Open choices:** that users or potential users are able to choose freely and easily between the services or digital content provided by the firm and services or digital content provided by other firms; and
 - (c) **Trust and transparency:** that users or potential users have the information they require to enable them to:
 - (i) understand the services or digital content provided by the firm through the relevant digital activity, including the terms on which they are provided, and
 - (ii) make properly informed decisions about whether and how they interact with the firm in respect of the relevant digital activity.
- 1.9 CRs must be of a 'permitted type' set out in an exhaustive list in the Act: they must be for the purpose of obliging the designated firm to do certain things (eg to trade on fair and reasonable terms) or preventing the designated firm

⁵ Section 19(3) of the Act.

⁶ Section 25 of the Act.

⁷ These terms have broad meanings: see section 118(1) and (2) of the Act and the explanatory notes to the Act, paragraph 533(f) and (g).

from doing certain things (eg restricting interoperability or using data unfairly).⁸

- 1.10 Before imposing a CR or a combination of CRs on a designated firm, the CMA must have regard in particular to the benefits for consumers that the CMA considers would likely result (directly or indirectly).⁹
- 1.11 The CMA may only impose a CR or a combination of CRs on a designated firm if it considers that it would be **proportionate** to do so for the purposes of one or more of the statutory objectives, having regard to what the CR or combination of CRs is intended to achieve.¹⁰ A proportionate CR or combination of CRs is one that:
- (a) Is effective in achieving its intended aim;
 - (b) Is no more onerous than it needs to be to achieve its intended aim;
 - (c) Is the least onerous, where the CMA has identified multiple equally effective options that would achieve the intended aim; and
 - (d) Does not produce disadvantages that are disproportionate to its aim.¹¹
- 1.12 Once imposed, CRs can remain in place while the SMS designation has effect. However, the CMA may vary or revoke a CR at any time, and the Act imposes a duty on the CMA to keep under review whether to do so.¹²
- 1.13 Before imposing (or revoking) a CR, the CMA must carry out a public consultation on the measure it proposes to impose or revoke.¹³

Our approach to setting conduct requirements

- 1.14 As explained in our published guidance,¹⁴ when considering whether and how to address issues in relation to a relevant digital activity we have regard to our Prioritisation Principles.¹⁵ These principles help to guide our choice of work where we have discretion to act. They consist of five key considerations:

⁸ Section 19(9) of the Act. The permitted types are set out in section 20.

⁹ Section 19(10) of the Act.

¹⁰ Section 19(5) of the Act.

¹¹ [Digital Markets Competition Regime Guidance](#), December 2024 (CMA194), paragraph 3.33.

¹² Section 25(a) of the Act.

¹³ Section 24 of the Act.

¹⁴ [Digital Markets Competition Regime Guidance](#), paragraph 3.11

¹⁵ [CMA Prioritisation Principles](#), October 2023 (CMA188).

- (a) **Strategic significance:** does CMA action in this area fit with the CMA's objectives and strategy, having regard to the Government's Strategic Steer to the CMA?
- (b) **Impact:** how substantial is the likely positive impact of CMA action?
- (c) **Is the CMA best placed to act:** is there an appropriate alternative to CMA action?
- (d) **Resources:** does the CMA have the right capacity in place to act effectively?
- (e) **Risk:** what types of risks are associated with CMA action, and how significant are they?

1.15 As set out in our guidance, we approach CRs through three analytical steps:¹⁶

- (a) **Aim** – we first identify what we want the CR to achieve. This will typically be more specific than the overarching statutory objective(s) for which it is imposed. In articulating the aim, we identify the issue we are seeking to address, based on the evidence gathering we have undertaken to date (which may include the factors that informed the CMA's decision to designate the firm as having SMS). We will have regard in particular to achieving benefits for consumers.¹⁷
- (b) **Effectiveness** – we then consider the content and form of CR(s) that could effectively meet our aim, including the specific design choices that could improve the effectiveness of our intervention.¹⁸
- (c) **Proportionality** – having decided which CR(s) would be effective in achieving our intended aim, we then consider whether the CR(s) we propose to impose would be proportionate, taking into account the potential effects – both positive and negative – on those most likely to be affected by the CR(s): eg the SMS firm; its competitors and customers; consumers and business users. We also consider the wider effects of the CR(s), including risks of market distortions and implications for the CMA in monitoring effectiveness. We do not typically seek to quantify these effects precisely, but consider their magnitude in the round, having regard to relevant quantitative and/or qualitative evidence.¹⁹

¹⁶ [Digital Markets Competition Regime Guidance](#), paragraph 3.20.

¹⁷ [Digital Markets Competition Regime Guidance](#), paragraphs 3.22-3.26.

¹⁸ [Digital Markets Competition Regime Guidance](#), paragraphs 3.27-3.32.

¹⁹ [Digital Markets Competition Regime Guidance](#), paragraphs 3.33-3.36.

Google's SMS in general search services

- 1.16 We launched our first SMS investigation, in January 2025, into Google's general search services. We chose this part of the digital economy in recognition of its importance to UK businesses and consumers (as a key gateway through which people access and navigate the world wide web, and businesses and content creators reach consumers); and the extensive prior work in the space that we (and others) have carried out.²⁰
- 1.17 After a nine-month investigation, on 10 October 2025 we designated Google as having SMS in the provision of general search services.²¹
- 1.18 Our investigation found, among other things, that:
- (a) Google receives [5-10] daily queries per UK citizen,²² and over 200,000 firms in the UK collectively spent more than £10 billion on Google search advertising last year.²³
 - (b) Google has long had a strong position in general search services. Google has accounted for a share of supply amongst traditional general search providers of over 90% in the UK for at least 15 years. Other traditional general search providers are significantly smaller than Google and have been for many years.²⁴ Although some AI assistants are an emerging competitive threat to Google's position in general search, there is significant uncertainty as to how use of these products will evolve and

²⁰ For example, the CMA has previously investigated Google's position in search, notably in its 2020 market study into online platforms and digital advertising. Several competition authorities globally have also investigated or taken action in relation to Google's general search services in recent years. For example: Alphabet Inc., together with its subsidiaries, has been designated as a 'gatekeeper' under the EU's Digital Markets Act in respect of certain 'core platform services', including its online search engine (Google Search) in the EU. Google has been designated by Japan's JFTC as a specified software operator under Japan's Mobile Software Competition Act and will be subject to certain prohibitions and obligations in relation to the provision of smartphone software. In proceedings brought by the US Department of Justice (**DoJ**) on behalf of federal and state governments, on 5 August 2024 the US District Court for the District of Columbia found that Google had acted illegally to maintain its monopoly position in the markets for 'general search services' and 'general search text advertising' in the US.

²¹ [Strategic Market Status investigation into Google's general search services: Final Decision \(SMS Decision\)](#), 10 October 2025.

²² [Strategic Market Status investigation into Google's general search services: Final Decision \(SMS Decision\)](#), 10 October 2025, paragraph 1.27.

²³ [Strategic Market Status investigation into Google's general search services: Final Decision \(SMS Decision\)](#), 10 October 2025, paragraph 1.5.

²⁴ [Strategic Market Status investigation into Google's general search services: Final Decision \(SMS Decision\)](#), 10 October 2025, paragraph 5.246.

whether they will become a sustained and significant competitive threat to Google.²⁵

- (c) Google's strong position in general search services is likely to persist over at least the next five years, taking into account:
- (i) Google's wider ecosystem (in particular, Chrome and Android), which provides Google with influence over important access points to users.²⁶
 - (ii) Google's significant default positions, especially in relation to Apple devices (including in the UK), as a result of significant payments to Apple that Google has been willing and able to make over many years while continuing to be highly profitable. Google continues to hold significant default positions on Android devices and the Chrome browser on desktop devices. In cases where users are presented with a choice regarding their default, Google continues to be overwhelmingly set as the default. These factors significantly affect the ability of alternatives to access users and to achieve scale.²⁷
- (d) Google's general search services are an important means by which other firms, across a wide variety of sectors, access customers, facilitate transactions, and therefore carry out their business. Changes to Google's general search services (eg changes to the display of the search engine results page (**SERP**)) can have significant impacts on a range of businesses. For example, specialised search services and associated trade associations expressed concern about Google's control of the ranking of results appearing on the SERP. Similarly, a majority of specialised search providers we spoke to indicated that changes to the presentation of Google's SERP have had an impact on either user behaviour or click-through rates in relation to their products in the last five years.²⁸

²⁵ [Strategic Market Status investigation into Google's general search services: Final Decision \(SMS Decision\)](#), 10 October 2025, paragraph 5.250.

²⁶ [Strategic Market Status investigation into Google's general search services: Final Decision \(SMS Decision\)](#), 10 October 2025, paragraph 5.256(a).

²⁷ [Strategic Market Status investigation into Google's general search services: Final Decision \(SMS Decision\)](#), 10 October 2025, paragraph 5.256(b).

²⁸ [Strategic Market Status investigation into Google's general search services: Final Decision \(SMS Decision\)](#), 10 October 2025, paragraph 5.280.

Our proposed conduct requirements in relation to Google's general search services

- 1.19 As explained above, SMS designation does not imply any wrongdoing. However, Google's substantial and entrenched market power and its position of strategic significance give rise to issues that we consider need to be addressed to make sure general search services work as effectively as possible for UK people and businesses.
- 1.20 As our guidance explains, the factors that informed the CMA's decision to designate a firm as having SMS in respect of a relevant digital activity, including its size, market power, and strategic significance, will often be highly relevant in identifying issues that could cause harm to businesses or consumers which the CMA may decide to address through CRs.²⁹
- 1.21 Given the importance of search as a core digital tool for people and businesses, as described in our SMS analysis, it is important that competition in search works well, and that consumers and businesses are treated fairly and can have confidence in the way they interact with Google in search.
- 1.22 In line with the CMA's '4Ps' framework,³⁰ we have taken steps to provide predictability on our work programme. For this reason, we published our 'Roadmap of possible interventions in search' in June 2025.³¹ In that document, we identified four measures as early priorities which we expected would deliver some of the quickest benefits for UK businesses and consumers. These 'Category 1' measures are what we are now consulting on.³²
- 1.23 Our proposed user choice CR would improve the functioning of competition in search, by enabling users to make active and informed choices about the search services they use. It would require Google to display a choice screen, as well as making other improvements to make it easier for users to switch the search services they use. These measures would help users more easily find a search service that meets their particular needs, and could increase the

²⁹ [Digital Markets Competition Regime Guidance](#), paragraph 3.25.

³⁰ [Delivering the 4Ps under the digital markets competition regime](#), 30 April 2025.

³¹ [Roadmap of possible measures to improve competition in search](#), 24 June 2025.

³² There are relationships between some of the proposals we are setting out in this consultation and some of the other potential measures we identified in the June 2025 Roadmap. Where this is the case, we set it out as part of our analysis. While we welcome stakeholder input on these potential separate measures, they are not the focus of this consultation. If we decide to take forward further measures they will be consulted on separately.

incentives for all parties in the market – including Google – to improve their services.

- 1.24 We are also consulting on measures to ensure that consumers and businesses that use search are treated fairly by Google. We are proposing a fair ranking CR, to make sure that Google's approach to ranking its search results is fair and transparent for businesses, and that parties have a route to raise concerns where Google's approach to ranking is having a negative impact on other markets. We are also proposing to give consumers more control of their data and promoting investment and innovation by businesses through a data portability CR. Finally, we are proposing measures to ensure that publishers can exercise meaningful choice over how their content is used by Google in its generative AI services. That choice would be supported by improved transparency over how their content is used and engaged with, and measures to ensure effective attribution of content.
- 1.25 For each of the measures on which we are consulting, the accompanying documents set out:
- (a) the draft of the CR on which we are consulting, as well as a draft of the accompanying interpretative notes that aim to support understanding of the CR;³³
 - (b) our provisional analysis in support of the proposed CR, based on the three-step process outlined above; and
 - (c) our provisional views on the compliance reporting requirements we could impose alongside the CR.
- 1.26 We welcome views from stakeholders on any aspect of the measures on which we are consulting, and the provisional analysis we have set out in support of them. At the end of each document we have also identified specific areas where we would particularly welcome feedback. We will take these views into account as we develop any CRs we decide to impose.

Interactions with other UK regulatory regimes

- 1.27 When exercising any of our digital markets functions, including setting CRs, the CMA has a statutory duty to consult certain regulators specified in the Act where it considers that they may have concurrent functions or there may be a

³³ For more information on the role of interpretative notes, see [Digital markets competition regime guidance](#), paragraphs 3.59-3.64.

material adverse effect on their remits and responsibilities.³⁴ In the course of developing our proposals we have held discussions with relevant regulators – particularly Ofcom and the Information Commissioners’ Office (**ICO**). We will continue to work closely with regulators where our measures interact with the regimes they oversee.

³⁴ Section 107 of the Act.

2. Summary of our proposed conduct requirements

- 2.1 Below we summarise the issues we are seeking to address and the proposed CRs on which we are consulting. This analysis is set out in more detail in each of the four consultation documents.

Improving user choice in search

- 2.2 Google's control of key search access points – in particular, its Android operating system and Chrome browser – gives it significant influence over the choices users make in search. On these access points, Google is normally set as the default search service and very few users choose to change this. As detailed in our SMS final decision, the evidence shows that defaults can act as a barrier to entry and expansion for rival search providers that are not set as the default on access points.³⁵
- 2.3 While existing choice architecture, such as voluntary choice screens, gives consumers the ability to make some choices about their preferred search providers, our analysis has identified a number of shortcomings with these existing arrangements. For example, existing choice screens are not shown on all the key access points and are only shown once in the lifetime of a device. Furthermore, the process for changing default search services outside of the choice screen is slower and more complex than necessary.
- 2.4 We want to empower consumers to make active, informed choices about the search services they use, and switch between those services quickly and easily. We also want to ensure that the eligibility criteria for inclusion in choice screens appropriately include relevant competing providers of search services, particularly as offerings, and user expectations and behaviour, evolve.
- 2.5 To this end, we have set out our proposals for a CR that requires Google to display a choice screen on key search access points, building on the choice screens that Google displays in the EU pursuant to the Digital Markets Act (**DMA**) and on a voluntary basis in the UK.
- 2.6 We also propose to enable consumers to quickly and easily change their default search services at any time – for example, by giving them the ability to

³⁵ [Strategic Market Status investigation into Google's general search services: Final Decision \(SMS Decision\)](#), 10 October 2025, paragraph 5.185.

change search services across access points in one place, and enabling them to resurface the choice screens at any time so they can consider the options.

Publisher choice, transparency and attribution

- 2.7 Google's general search services are a key gateway through which people access and navigate the world wide web, and businesses and content creators can reach consumers. Because of this, the way that Google uses publishers' content where this is gathered for the purposes of search can have significant impacts on outcomes for publishers and end users.
- 2.8 Historically, the resulting clicks and links back to websites from Google Search have given publishers value in return. However, as Google has rolled out generative AI features, such as AI Overviews and AI Mode, this balance has shifted. Publishers are now faced with a decline in referrals back to their websites, and limited visibility as to how their content is being used in these novel systems.
- 2.9 In light of this, our proposed CR seeks to address three main issues:
- (a) First, publishers currently do not have sufficient choice over how their content, gathered for search, is used by Google in its AI-generated responses. Given Google's Strategic Market Status in search, publishers have no realistic option but to allow their content to be crawled. By not providing sufficient control over how this content is used, Google can limit the ability of publishers to monetise their content, while accessing content for AI-generated results in a way that its competitors cannot match.
 - (b) Second, publishers have limited transparency over how their content is used by Google in AI-generated responses and how users engage with that content. This makes it harder for publishers to make informed decisions, including on whether to allow Google to use their content and for which purposes.
 - (c) Third, effective attribution of content in AI-generated responses is important for both consumers and publishers. For consumers, attribution can allow them to test the veracity of AI-generated content. For publishers, attribution can help ensure that consumers are aware of the sources of content, which in turn can allow them to sustain brand value and the creation of new material.
- 2.10 Our proposed CR would require Google to:

- (a) ensure publishers have a meaningful and effective control over whether their content is used in the grounding of content within search generative AI features (such as AI Overviews);
- (b) clarify the scope of the existing Google-Extended control which publishers can use to opt out of their content being used in generative AI models outside of search;
- (c) provide greater transparency over how publishers' content is used to create Google's AI-generated responses, and on how users interact with search generative AI features; and
- (d) take reasonable steps to ensure the effective attribution of publisher content in its search generative AI features and explain the steps it takes to achieve this.

Fair ranking

- 2.11 Given the importance of Google's service as a core route to market for businesses, it is essential that they can have confidence in the way they are treated by Google in search. We are concerned that, at present, many businesses do not have this confidence in Google's search results.
- 2.12 The evidence we have seen suggests this lack of confidence could be inhibiting investment and innovation by these businesses as they are unsure whether they will be able to effectively reach consumers through Google Search and earn a return on their investment.
- 2.13 The evidence we have seen also suggests that businesses lack transparency over Google's approach to search ranking, and lack notice of forthcoming changes. This gives rise to potentially avoidable costs for businesses, that arise from the need to understand and rapidly respond to changes made by Google, to ensure they continue to be visible to their consumers in search results.
- 2.14 We also have concerns that Google does not currently have incentives to consider or mitigate the negative impacts on other markets of changes to its ranking systems and policies. When such impacts occur, the evidence we have seen suggests existing routes to raise complaints are limited in scope and effectiveness.
- 2.15 In light of these issues, we want to ensure that businesses that are listed on Google Search can trust how search results are presented and ranked; and are able to plan for changes to search that may affect their business. We also want to ensure that Google appropriately considers how its conduct can

impact other markets; and provides routes for parties to raise concerns when things go wrong.

- 2.16 To this end, we are consulting on a 'fair ranking' CR, to improve businesses' confidence in Google's approach to presenting and ranking general search results. Our proposed approach recognises that Google needs to be able to continue to innovate in pursuit of providing results that are most helpful to consumers; and that we need to avoid providing opportunities to game the search algorithm in ways that reduce the quality of search results.

Data portability

- 2.17 Giving consumers control over their search data, and enabling them to freely transfer it between providers, can unlock new products and services that consumers value. More generally, ensuring access to this data can enable the development of innovative new products and services in sectors such as advertising and financial services, supporting broader innovation in the UK economy.
- 2.18 Google already offers a data portability application programming interface (the **API**) in the UK on a voluntary basis. We have heard positive feedback about this mechanism. However, the parties using this data do not currently have confidence that the API will continue to be available. The evidence we have seen suggests that this uncertainty could be inhibiting innovation and investment. This is why we are setting out our proposals for a CR to put Google's provision of data portability in the UK on a legal footing, ensuring that parties can rely on its continued availability and invest with confidence.

3. Next steps

Responding to this consultation

- 3.1 Stakeholders are invited to comment on the proposed measures set out in the consultation documents we have published. We particularly welcome comments on the specific questions we set out at the end of each document. We will carefully consider responses to this consultation, in addition to our ongoing stakeholder engagement and wider analysis, before proceeding with any proposed measures.
- 3.2 Responses should be submitted to searchsms@cma.gov.uk or made via the [consultation portal](#) no later than **5pm on 25 February 2026**. We would expect to publish responses to the consultation, subject to any representations made in relation to confidentiality of the information provided.
- 3.3 Where responses include confidential information, this should be clearly marked. A non-confidential version should also be provided that can be published on the CMA's website.

Future work programme

- 3.4 As set out in the [blog](#) published on the Search SMS case page, we are continuing to consider our future work programme in search. As part of this, we will need to consider developments in other jurisdictions, including the final remedies judgment in the US search litigation³⁶ and the ongoing implementation of and compliance with the DMA.³⁷ We will also consider the impact of any Category 1 measures we introduce. We will provide further updates as our work develops.

³⁶ *United States and the State of Colorado vs Google LLC* 5 December 2025, [United States of America v Google LLC – Courtlistener](#).

³⁷ For example, [DMA.100193 – Alphabet – Online Search Engine – Google Search – Article 6\(5\)](#), 25 March 2024.