

Annex 2 - Operation of SafeSearch

I. Introduction and Summary

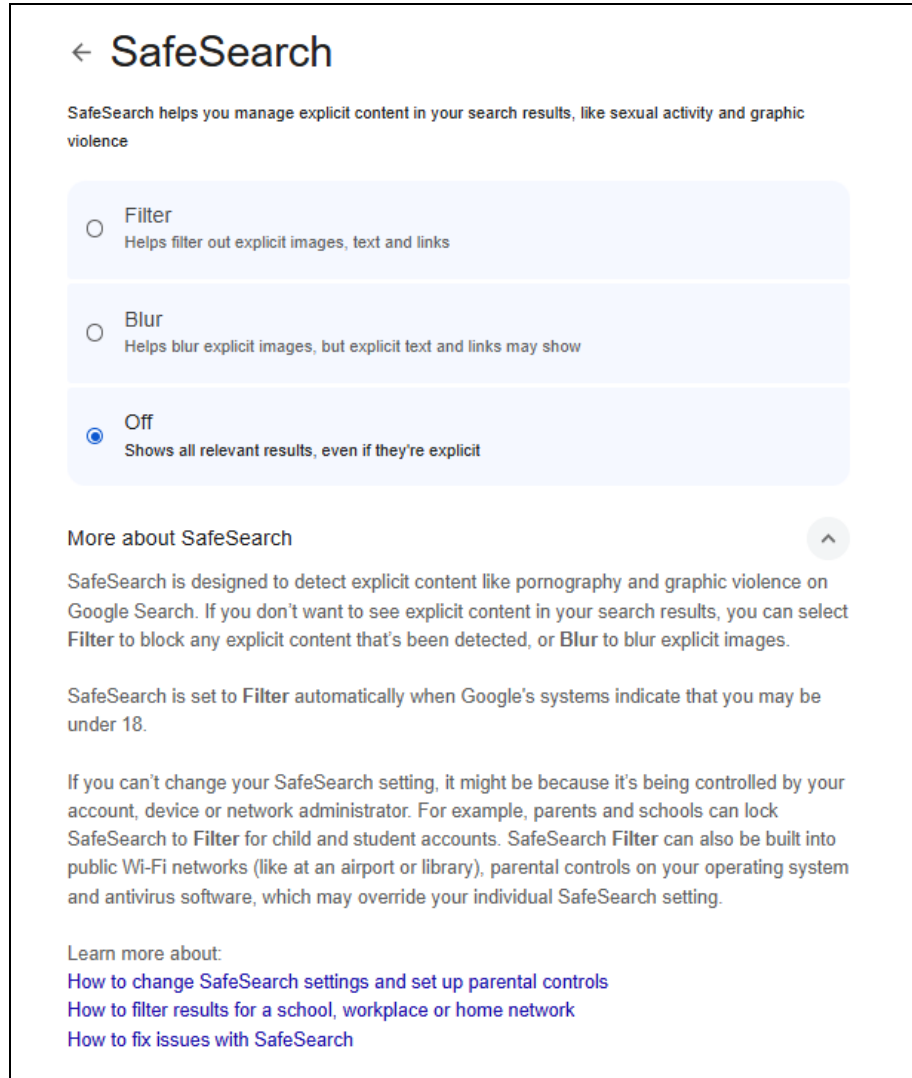
1. This Annex supplements Google's response to the Competition and Markets Authority (**CMA**) consultation of 28 January 2026 (**Consultation**) on the proposed conduct requirement (**CR**) in relation to fair ranking. It responds specifically to paragraph 1.17(b) of the Consultation, in relation to the operation of the SafeSearch feature.
2. The Consultation notes that some sexual wellness providers have alleged that the SafeSearch feature limits their discoverability and traffic and also appears to apply in a discriminatory way, restricting results from specialist retailers but not results for more general retailers like Amazon or Boots. These allegations lack merit.
3. SafeSearch is a tool designed to protect minors and provide adult users with the option to avoid or blur out explicit content if they choose. Websites are not removed from Google's index or search results as a result of SafeSearch. Instead, explicit content is filtered out for users who are under 18, or it is blurred or filtered out for users over 18 who have enabled SafeSearch's blurring or filtering option and are exercising their choice to not be exposed to such content.
4. SafeSearch is consistent with widespread efforts to enhance the protection of children when they are online.¹ And SafeSearch complies with the CMA's principles around fair and non-discriminatory ranking: SafeSearch does not prevent the discoverability of sexual wellness sites, nor is its application discriminatory.
5. [≈] adult users use SafeSearch's blur mode. Blur mode is the default setting for users who have not consented to be shown explicit content and for users whose age is unknown to Google. This default prevents unsuspecting users from accidentally coming across explicit content while searching.
6. Sexual wellness sites will appear in results for users with SafeSearch's blur mode enabled, and will rank in the same place as if the SafeSearch feature were switched off. Users who want to see the blurred images can easily do so by unblurring them via an option directly on the result page.
7. For users who have enabled filtering of explicit content, sexual wellness sites will be filtered because they are categorised as sites with predominantly adult content. Sites like Amazon or Boots are not sites with predominantly adult content and will therefore not be filtered. This is not discriminatory – it treats different things differently.

¹ For instance, and as noted by the CMA, Ofcom has released [Guidance on Content Harmful to Children](#).

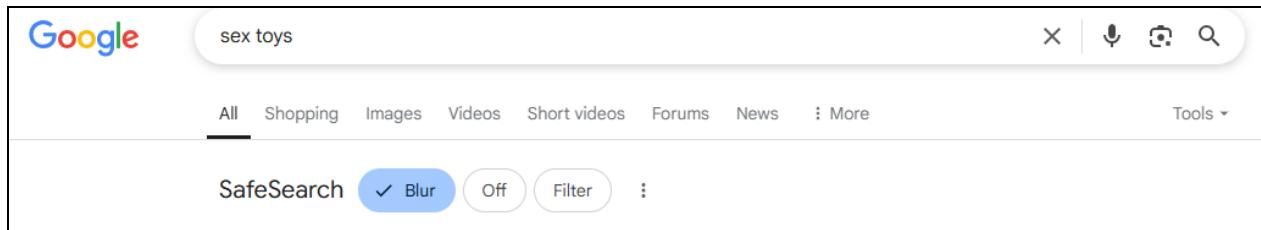
8. Similarly, the possibility that SafeSearch may not blur explicit content with complete perfection is not a sign that it is discriminatory. SafeSearch operates with algorithms that seek to detect explicit content based on a series of signals that are indicative of such content. Detecting explicit content is complex and difficult. Therefore, some explicit content may escape blurring by the algorithms of SafeSearch, especially when such content appears on sites that are not mainly about adult content or where the content is intermingled with other non-explicit content. And content that is arguably not explicit, but is close to the line, may be characterized as explicit when it is surrounded by clearly explicit content. This is inevitable, given the vast number of web pages and the large volume of different content that exists on the internet. The fact that an algorithmic classification tool of a complex issue may not exhibit perfection is not indicative of any discrimination.
9. Google has no interest in discriminating against sexual wellness sites. Its only interest is to detect explicit content to the best of its abilities to protect minors and respect user choices about whether they wish to see explicit content.
10. The remainder of this Annex expands on these points. **Section II** explains the operation of SafeSearch. **Section III** shows that complaints from sexual wellness providers that SafeSearch limits discoverability and is discriminatory lack merit. **Section IV** demonstrates that SafeSearch complies fully with the CMA's principles on fair ranking. **Section V** concludes.
- II. **SafeSearch is an optional tool that lets users blur or filter explicit content in search results**
11. Google aims to provide all users of Search, no matter their age, with a great experience. Google recognises that certain results on Search would be inappropriate for Search users who are minors, and also endeavours to respect the preferences of adult users who do not wish to see explicit content in their Search results.
12. In order to do so, Google developed the SafeSearch feature and introduced it in EU Member States between 2000 and 2003, following the creation of the first iteration of SafeSearch in 1999.
13. The aim of SafeSearch is twofold:
 - a. To protect minors online; and
 - b. To provide adult users with the option to avoid explicit content, if they have not consented to be shown such content.

14. To achieve these aims, if SafeSearch is enabled, it will blur or filter explicit material in Google's search results. Google defines explicit content to include nudity, graphic sex acts or sexually explicit material as well as violent or gory content.²
15. **SafeSearch puts the user in control.** SafeSearch puts the user in control by giving them three options:
 - a. **Off.** When SafeSearch is off, Google provides a foundational layer of protection, including query understanding for potentially explicit content, automated protections and enforcement of content policies, as well as hotlines and authoritative information for personal crisis queries.
 - b. **Blur.** SafeSearch's "blur" setting blurs explicit images in search, image and video results, while explicit text and links may still show. Users can choose to unblur specific images, while keeping the rest blurred. The "blur" setting provides an intermediate level of protection.
 - c. **Filter.** SafeSearch's "filter" setting, filters out explicit images, text and links from Google's result. The "filter" setting provides the highest level of protection.
16. For queries where SafeSearch is likely to be enabled, the user can easily identify whether SafeSearch is turned on and what mode it is in based on the buttons placed above the search results. The user can also navigate to account settings and select the SafeSearch option she wishes to use, as illustrated below:

² See [Filter or blur explicit results with SafeSearch](#), Google Search Help.



17. By default, SafeSearch for adults is set to “Blur,” *i.e.*, the SafeSearch blur setting is the default for users over 18 and signed-out users whose age is unknown. For users that Google’s systems indicate are minors, SafeSearch is set to “Filter.” These default settings are important to prevent users from inadvertently coming across an explicit or graphic image while searching for information and particularly to help protect minors.
18. For adults, these default settings are easily changed, irrespective of whether the user is signed in or not. First, users can use the “manage settings” control for SafeSearch (as shown above). Second, users can also change their SafeSearch settings at the top of the Search Engine Results Page (SERP) for potentially explicit results where SafeSearch is relevant (see screenshot below).



19. The control above allows the user to easily toggle between the different SafeSearch options directly on the result page, any change is then directly applied to the results shown on the result page. Users who are intending to search for explicit content, such as adult toys, can easily change their settings to facilitate these searches.
20. For child and student accounts, parents and schools can lock SafeSearch in "Filter."
21. **SafeSearch is based on automatically operating algorithms.** Given the vast amount of web pages and content on the internet, Google relies on algorithms to detect explicit content. These algorithms are machine learning systems that are trained to distinguish between explicit and non-explicit content. For any given piece of content they then calculate the probability, based on a series of signals, that the content in question is explicit content.
22. As one of the signals for assessing whether content is explicit, SafeSearch considers whether a website has a high propensity for explicit content across its whole site. This makes sense: if a site is a hardcore pornography site, it is more likely that an image of a penis from the site is pornography, rather than art and therefore should be subject to the SafeSearch protection.
23. More generally, any image that is at the borderline of what Google's algorithms consider explicit is more likely to be pornography if it is surrounded by other sexually explicit content. Given that the primary objective of SafeSearch is to guarantee an adequate level of protection for minors online, the notion of "*explicit content*" is interpreted broadly.
24. In the same way, when SafeSearch considers whether a result for an anatomically realistic adult toy is explicit or not, it takes into account the fact that a sexual wellness product retailer's website, as a whole, has a higher propensity for explicit content, and will be more likely to blur images from this website. This is necessary because it is not easy, just from the image, for SafeSearch to tell whether an image is of, for example, an adult toy or just a brightly-coloured, amorphous piece of silicone. So, SafeSearch has to look at other signals, like the website's overall propensity for explicit content, as a means to protect minors and users that want to be protected from explicit content.

25. **SafeSearch errs on the side of caution if it detects that a site as a whole hosts explicit content.** SafeSearch errs on the side of caution and blurs or filters images from sites that Google detects as a whole to host explicit content, if the user has chosen to be protected by SafeSearch. If SafeSearch did not operate in this way, children and adults who have chosen not to see explicit content may be exposed to such content.
 26. **Website operators have options to prevent their content from being incorrectly identified as explicit content.** Website operators have the option of tagging explicit content on their sites using industry-standard HTML meta directives, or they can group explicit pages on their site separately from non-explicit pages. Doing this helps Google's systems recognise if a website is not entirely explicit in nature, if it also has non-explicit pages. Google provides website operators with documentation on how SafeSearch works and on how to optimize their site for SafeSearch to ensure that users find the results they are looking for and are not surprised once they visit the sites.³
- III. Complaints that SafeSearch limits discoverability and is discriminatory lack basis**
27. Claims that SafeSearch reduces discoverability and is discriminatory towards sexual wellness providers lack merit.
 28. **SafeSearch does not limit discoverability for sexual wellness sites.** SafeSearch does not remove sites from Google's search results. Safesearch is a tool for *users to specify what kind of content they want*. Explicit content is simply blurred or filtered out for those users who have enabled SafeSearch's blurring or filtering option and are exercising their choice to not be exposed to such content, users who have consented to be shown such content or whose age is unknown to Google and it is filtered for users under 18.
 29. [~] users ([~]) have the blur option enabled. When such users are searching for adult toys, results for explicit content will show – explicit images will simply be blurred. [~] of users are identified as minors and so have SafeSearch filter mode turned on; [~] of users have made a conscious decision to turn on Filter. The remaining [~] of users have SafeSearch turned off.
 30. To the extent that results include images and those are blurred, but users want to see the unblurred images before clicking through to a result, they can readily unblur the images through the available options directly on the result page.

³ See [SafeSearch and Your Website | Google Search Central | Documentation](#).

31. If a user has SafeSearch turned on to “filter” mode, sexual wellness sites are generally filtered out from the results, because SafeSearch detects that such sites have a high proportion of explicit content.
32. As seen, adult users who have decided to filter adult content are [§<] and are, in any event, unlikely to be the target audience for sexual wellness products. But if such users wish to conduct searches for such offerings, they can easily identify whether SafeSearch is on and turn SafeSearch off if they wish, directly from the SERP.
33. Given the way that SafeSearch operates with the default setting limited to blurring and the ease of changing these settings for adult users, there is simply no basis for a claim that SafeSearch impacts discoverability for sexual wellness sites.
34. **SafeSearch is non-discriminatory.** The claim from sexual wellness providers that the SafeSearch feature applies in a discriminatory way to their sites is inaccurate.
35. For [§<] users, the SafeSearch setting is set to just blurring explicit images and therefore results from sexual wellness sites *will* show alongside other relevant retailers, ranked in the same order as if the blurring had not been applied. For adult users who have consciously chosen to filter explicit content, sexual wellness sites may be filtered while a general retailer like Boots or Amazon may show. This is not discriminatory because sexual wellness sites have predominantly adult content while Boots and Amazon do not.
36. Likewise, the blurring of images on sexual wellness sites is not discriminatory. SafeSearch’s algorithms are able to detect more easily that images on sexual wellness sites are explicit content because they appear on sites that are predominantly made up of adult content. This makes it easier for the algorithms to identify the images as explicit content and blur them. By contrast it is much harder for SafeSearch’s algorithms to detect images with explicit content when it appears among a multitude of other non-explicit content, as e.g., in the case of Boots or Amazon.
37. That such images might not be blurred does not amount to discrimination. It simply reflects the inherent practical constraints of detecting explicit content. Detecting explicit content is complex and difficult. Some explicit content therefore may escape blurring by the algorithms of SafeSearch; some content that is arguably not explicit may be blurred if contextual signals strongly indicate that it is likely explicit. This is inevitable, given the vast number of web pages, the large volume of different content that exists on the internet, and the inherent difficulty in identifying explicit content such as sexual wellness products. It is not indicative of any discrimination.
38. Google confronts the problem that its search results—including its SafeSearch system—might fall short of perfection in many ways, and Google must prioritize which of those ways it will focus on improving. All being equal, Google would choose to focus

on enhancing the ability of SafeSearch to protect minors and other adult users who do not wish to see explicit content. Adding protection for sexual wellness sites poses upfront engineering and development costs, requires ongoing maintenance, increases the time taken to process content, adds engineering complexity, and increases the risk that minors can be exposed to adult material. These are resources that could instead be spent improving other areas of the SafeSearch system instead.

- 39. Google has no interest in discriminating against sexual wellness sites. Its only interest is to detect explicit content to the best of its abilities to protect minors and respect user choices about whether they wish to see explicit content.
- 40. As a final point: Sexual wellness sites have the option to group explicit content (like adult sex toys) on its site into a specific subdomain, separate to non-explicit content. This will help Google's systems to recognise if a website is not entirely explicit in nature, if it also has some non-explicit pages (e.g. help pages, refund policies, shipping etc). In these cases, the non-explicit pages of the site will not be blurred or filtered, even if the user has the SafeSearch "Filter" mode enabled. Information and instructions for site owners are transparently provided as part of Google Search Central.⁴

IV. SafeSearch complies with the stated aims of the Fair Ranking CR

- 41. The CMA's proposed Fair Ranking CR comprises three components: (i) non-discrimination and objectivity, (ii) transparency and (iii) non-distortion and complaints. The SafeSearch tool is consistent with each of these.
- 42. **Non-discrimination and objectivity.** As explained above, SafeSearch does not discriminate against any specific site or groups of sites. SafeSearch is driven by user choice and allows adult users to be in control of what they see on Search. SafeSearch operates algorithmically and uses contextual, sitewide cues to help identify explicit content. As with any algorithmic process, there may be gaps and some sites may escape being affected by SafeSearch. However, this is not indicative of discrimination.
- 43. **Transparency.** Google's approach is fully transparent because Google explains publicly how SafeSearch operates.⁵ Google also publishes guidance for site owners on how to structure their site so that the algorithms have the best chance of correctly identifying and treating explicit content.⁶

⁴ [SafeSearch and Your Website | Google Search Central | Documentation | Google for Developers](#)

⁵ [Filter or blur explicit results with SafeSearch - Android - Google Search Help.](#)

⁶ [SEO Guidelines for Explicit Content | Google Search Central | Documentation | Google for Developers.](#)

44. **Non-distortion.** In publishing detailed information on the operation of the SafeSearch feature, Google is also seeking to minimise any market distortion likely to be caused and seeking to help site owners structure their site in the best way so that they do not experience any unintended search engine optimisation-related consequences. However, Google's primary purpose in developing the SafeSearch feature, over and above minimising market distortion, is to promote the safety of minors online and also safeguard the right of adult users to choose the content they see. And in doing so, Google allocates its resources to solving the highest-impact problems that it is aware of.
45. **Complaints.** In addition to publishing detailed guidance on how the SafeSearch feature works and the best practices to avoid mislabelling, Google has a bespoke feedback and complaints mechanism through which site owners can advise Google that their site has been incorrectly flagged as explicit by SafeSearch.⁷ Google manually reviews each of these requests and conducts an assessment of whether the relevant content on the site is indeed explicit or not, according to its content policies. In the case of a request from the [3<]Google assessed the images on the site and deemed that many of them amounted to explicit content, particularly as many images included photo-realistic sex toys.

V. Conclusion

46. SafeSearch is a tool that protects minors and provides adult users with the option to avoid or blur out explicit content, if they choose. SafeSearch does not limit discoverability and is not discriminatory towards sexual wellness sites. It simply puts the user in control of what they want to see.

⁷ [Request a review: my website is incorrectly flagged by SafeSearch - Search Console Help.](#)