

CONTENT CODE REVIEW 2025

PUBLIC CONSULTATION REPORT

NOVEMBER 2025

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A. OVERVIEW

The Communications and Multimedia Content Forum of Malaysia (“CMCF”) commenced its Public Consultation (“PC”) on 17 September 2025 as part of the review and update of the Malaysian Communications and Multimedia Content Code (“CC2022”).

This review followed an earlier feedback exercise held from 26 February to 31 May 2025, which invited members of the public to suggest improvements to CC2022. All feedback gathered during this period was assessed by the Content Code Review Working Group (WG), alongside views shared by industry members and relevant stakeholders. These collective insights formed the foundation of the proposed draft released for the PC.

Consistent with CMCF’s established practice, the PC was designed to be holistic, inclusive, and accessible. Participation was encouraged across industry sectors, civil society organisations, government agencies, academia, and the general public. Engagement activities included:

- a) publication of the Public Consultation Paper on 17 September 2025, with a public call for feedback on the CMCF website;
- b) virtual town hall sessions with industry representatives, the public, and institutes of higher learning;
- c) radio, television and digital coverage to raise awareness and encourage broad participation;
- d) media coverage via press releases and featured interviews across print, broadcast, and digital platforms.

Messrs. Christopher & Lee Ong served as legal consultants, ensuring that the draft remained aligned with Malaysian laws and reflected global best practices.

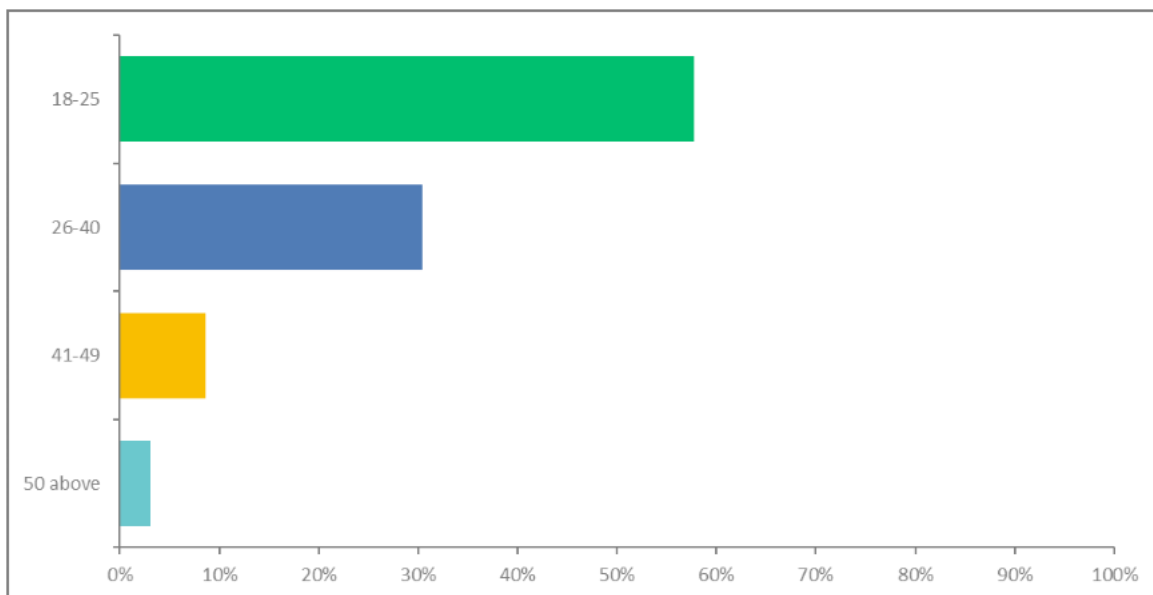
At the close of the PC period on 7 November 2025, CMCF received **a total of 1,891 submissions**, comprising 7 written submissions via the consultation paper and 1,884 responses via the official online survey.

Input was received from a wide range of stakeholders, including academics, industry players, civil society groups, content creators, platforms, regulators, legal professionals, media practitioners, telecommunications providers, youth groups, and the general public.

This collective feedback now forms the backbone of the next phase of revisions to strengthen and future-proof the Content Code, and the next segment provides an overview of respondents' general feedback based on the survey questions.

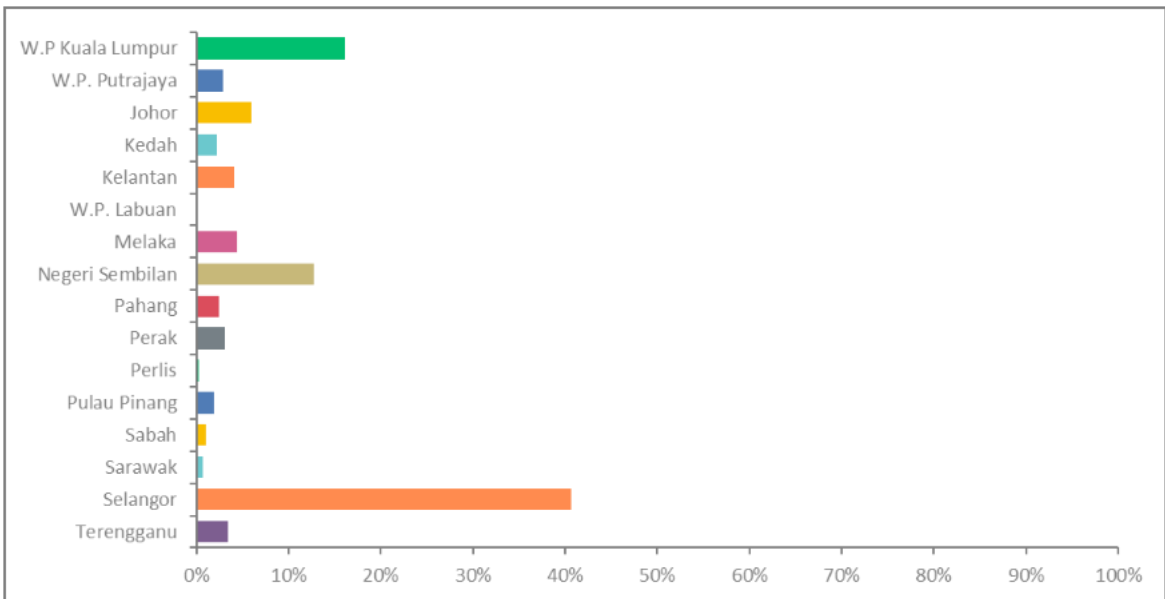
Respondent Profile and Demographic Overview

a. Age Distribution



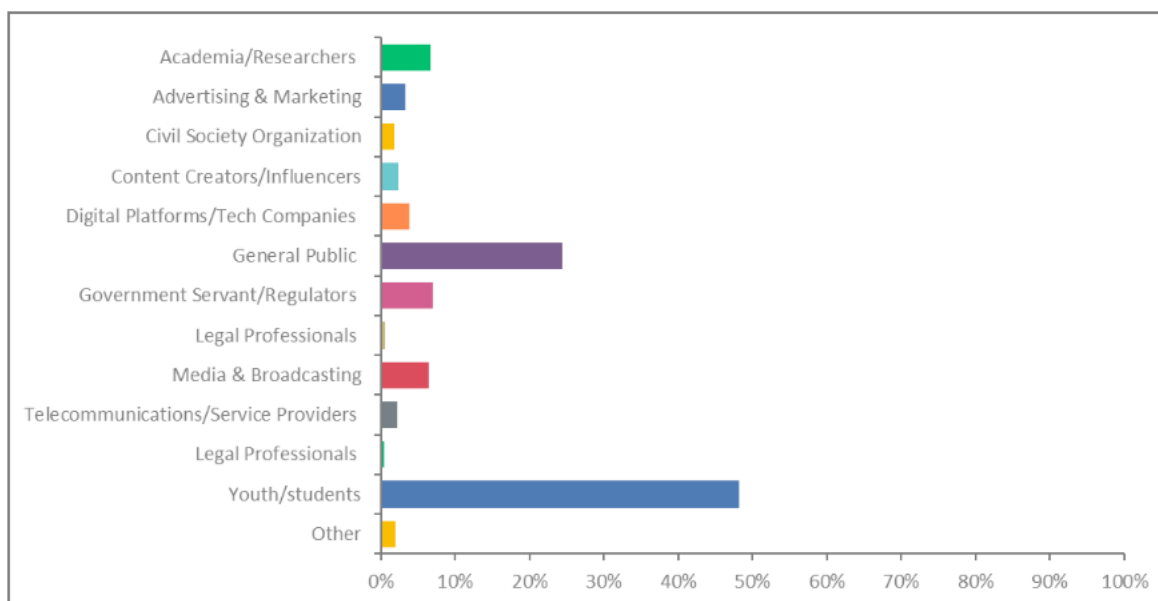
A significant proportion of respondents were youth. Individuals aged 18 to 25 made up 57.8% of all submissions, showing strong engagement from younger users who are highly active in the digital environment. Respondents aged 26 to 40 accounted for 30.47%, offering perspectives from working adults who rely on online platforms in both personal and professional contexts. Valuable input also came from respondents aged 41 to 49 (8.65%) and those aged 50 and above (3.08%). This wide age range provided diverse insights that reflect different life stages, digital habits and levels of online experience.

b. Geographic Representation



The Public Consultation was open to all adult Malaysians, and responses were received from across the country. Selangor recorded the highest participation at 40.66%, followed by Kuala Lumpur at 16.14% and Negeri Sembilan at 12.74%. There was also strong representation from Johor, Melaka, Kelantan, Terengganu, Perak and Putrajaya. Smaller but meaningful contributions from states such as Kedah, Pahang, Pulau Pinang, Sabah, Sarawak, Perlis and Labuan added to the overall balance. The wide geographical spread demonstrates that interest in the Content Code extends beyond major urban centres and reflects diverse perspectives from different regions of Malaysia.

c. Professional and Sector Background



The consultation attracted participation from a wide spectrum of groups. Youth and students formed the largest segment at 48.20%, demonstrating strong interest from younger Malaysians who are active users of digital platforms. Members of the general public accounted for 24.31%, reflecting broad community engagement. Government regulators (7.01%), academics (6.74%) and media and broadcasting professionals (6.37%) contributed important institutional and industry perspectives that strengthened the depth of the feedback received.

Additional input came from digital platforms and technology companies, advertisers and marketers, telecommunications providers, content creators, civil society organisations and legal professionals.

We also received submissions that were provided on behalf of organisations, and a small number came from international entities or experts. These were considered carefully and used as reference points for benchmarking against global best practices, while ensuring that all recommendations were balanced against Malaysia's local context, cultural considerations and regulatory

environment.

Further comments were submitted by respondents who selected “Other”, adding to the diversity of viewpoints. This broad mix ensured that the consultation captured both community sentiment and real industry considerations, resulting in a well-rounded and representative set of insights.

B. OVERVIEW OF RESPONDENTS' FEEDBACK ON KEY AREAS HIGHLIGHTED IN THE SURVEY

1. Legal Alignment and Clarity

Question 1: In line with the amendments to Section 233 of the Communications and Multimedia Act, the term 'offensive' has been replaced with 'grossly offensive'. Grossly offensive content refers to material that most reasonable people would regard as deeply offensive. Content that is merely in poor taste or annoying to some does not fall within this category.

Example:

Grossly Offensive: A post showing graphic violence with racial slurs against a minority group.

Not Grossly Offensive: A joke about someone's cooking that some may find rude.

The Change from 'Offensive' to 'Grossly Offensive' in line with the Communications and Multimedia Act 1998 (CMA98).

A majority of respondents (97.4%) agreed with this standard, and many welcomed the intention behind strengthening it. At the same time, respondents felt that the shift from "offensive" to "grossly offensive" would benefit from clearer explanation. Practical guidance, such as examples or supporting context, was seen as helpful for determining what qualifies as grossly offensive. Although the amendment explains that grossly offensive content refers to material that most reasonable people would regard as deeply offensive, some respondents highlighted that this standard can still feel subjective, particularly across different cultural, contextual, and linguistic settings.

These concerns about interpretation and consistency are understandable, and they can be addressed when viewed within the broader safeguards and explanatory notes contained throughout the Content Code, together with the guidance that will naturally develop over time through case law and Complaints Bureau decisions.

Several respondents also noted that “grossly offensive” is not something that can be measured objectively or quantified. Judgments often rely on social norms, precedent, and interpretation, all of which evolve over time. Respondents cautioned against relying too heavily on majority sentiment, as this could desensitise society to certain harms or normalise content that is harmful simply because people have grown accustomed to it. To strengthen clarity, some suggested anchoring the definition to foreseeable and measurable harm, such as psychological distress or humiliation, rather than fluctuating levels of public outrage. This feedback aligns with the wider harm-minimisation principles embedded across the Content Code and can be incorporated into the accompanying guidance notes.

Respondents also requested more clarity on how the provision applies across various platforms and content types, including whether mature-rated video games, particularly when streamed live, would fall within its scope. This is a useful observation and can be addressed when the provision is read together with the general applicability, context-based assessment, and platform-specific obligations articulated in other sections of the Content Code, with further guidance and details to be developed in the ancillary instruments that accompany the Code.

Question 2: For avoidance of doubt, the Code will allow action against content that may not be grossly offensive on its face but is offensive in context where it causes material harm.

For example, malicious content targeting a student leading to widespread online bullying and emotional harm.

The Clarification of the term 'Offensive' in Context

Most respondents (98.6%) supported the intention behind this clarification. Many acknowledged that context matters and that content which appears mild at first glance can still cause real harm. Respondents also recognised the impact of online harm on mental health and emotional well-being. They agreed on the importance of protecting vulnerable individuals and ensuring that harmful conduct, even when subtle, is addressed in a transparent and consistent manner.

A small number of concerns were raised, mainly relating to clarity, legal limits, and enforcement consistency. A few respondents emphasised the importance of defining “material harm” more clearly to avoid ambiguity or misuse. Some highlighted that the term “grossly offensive” can feel subjective, and without clearer guidelines, the proposed approach may create uncertainty or inconsistent decisions. Some respondents also suggested including examples beyond bullying—such as doxxing or deepfake humiliation—to help ensure cases are handled consistently and interpreted in a clear and predictable way. Others expressed concern that a broad or unclear standard could unintentionally restrict legitimate criticism, satire, debate, or strong opinions, which are essential forms of expression.

Some respondents also noted the challenge of accountability when content is

reshared, altered into memes, or taken out of context. They suggested that a clearer distinction is needed between content that is genuinely harmful or malicious and content that is merely unpopular or uncomfortable but does not actually cause harm.

It is worthwhile to note that these points are best understood when viewed alongside the broader safeguards, contextual assessment principles, and explanatory notes in the Content Code. The Code already includes provisions that recognise satire, parody, legitimate commentary, and criticism, together with other measures that uphold freedom of expression while ensuring responsible content standards. The overall framework provides a clear and cohesive basis for interpreting this provision in practice, with clarity reinforced through ongoing Complaints Bureau orders, training, awareness efforts, and continued dialogue with stakeholders.

Question 3: Menacing content includes material that causes harassment, intimidation, or distress; threatens serious harm; incites crime; or leads to public disorder. Examples include threats of acid attacks, doxxing, false bomb threats, or incitement to racial violence.

The Strengthening of the Definition for ‘Menacing Content’

Respondents generally agreed (98%) that menacing content is highly dangerous, even when expressed jokingly, because it can cause fear, compromise personal privacy, and lead to real harm. A small portion of respondents raised additional points for consideration. Some felt that the current definition is too broad and may be interpreted inconsistently. Several noted that “serious harm” and “harassment” differ significantly in nature, with one carrying far heavier implications than the other, and that clearer definitions would help assess the full range of behaviours

covered by these terms.

A minority also suggested providing clarity on how intention and context are assessed when determining whether content is menacing. They felt this would ensure that enforcement remains fair while protecting users from genuine threats. There were also isolated concerns that unclear boundaries could be misinterpreted in ways that silence legitimate criticism, peaceful religious expression, or human rights advocacy.

A few respondents stressed that discussions grounded in historical facts or public debate should not automatically be viewed as menacing. Some also highlighted that fictional or creative works which depict threats such as acid attacks, doxxing, or racial incitement for educational purposes should be approached differently when the intent is clearly to inform rather than to cause harm.

The insights shared by respondents provide a practical basis for refining how this provision is applied in real-world contexts.

2. Artificial Intelligence (AI) and Emerging Technologies

Question 4: Content generated or edited by AI and shared publicly should always include a clear label, except where it is for private use, where it is clearly artistic or fictional, or where AI only plays a minor role such as summarisation.

On the Requirement for AI Labelling

Most respondents (96.8%) supported clear AI labelling to help the public recognise when AI is involved and make better judgments about authenticity. Many viewed this initiative as important in reducing misinformation in political, social, and religious contexts, while also respecting the work of human creators and

addressing risks linked to AI-related crimes.

There was strong agreement that publicly shared AI-generated content should be labelled, even when created for artistic, fictional, or personal reasons. Some respondents felt that even minor AI involvement, such as summarisation or small edits, should be labelled because it can influence how information is perceived. Others noted that the “artistic or fictional” exemption may be too broad and suggested refining or clarifying its scope. A few also requested clearer illustrations of what constitutes a “minor role” of AI so that creators can comply with greater confidence.

Respondents also highlighted the importance of distinguishing between AI tools that assist with edits or formatting and AI systems that generate new content or alter factual elements. They pointed to the difference between an influencer using AI to enhance a video and an influencer using AI to alter their appearance entirely, such as transforming into a child or an animal, as examples that carry very different implications.

Many respondents stressed that labelling should focus on potential harm rather than the technology itself. It was suggested that audiovisual entertainment be explicitly excluded from labelling requirements to ensure practical implementation and maintain the audience experience. Respondents noted that AI used in film, television, visual effects, and other curated content is generally a low-risk use case that does not present misinformation concerns because it is clearly fictional. Labelling such content could disrupt viewer immersion and hinder creativity. Examples such as the EU AI Act and Korea’s AI Framework Act were cited, both of which exempt artistic and creative works to avoid unnecessary interference. Some respondents suggested curated content should be excluded from the scope of the

proposed voluntary AI labelling measure. Any voluntary AI labelling measure should focus on high-risk contexts – content that poses a more significant risk, such as AI-generated deepfakes.

Respondents also raised the need to differentiate between editorial use and creative or promotional use of AI. For example, factual summaries or caption generation differ from creative work like entertainment shows or branded features. Clear distinctions will help prevent confusion, especially for hybrid content that mixes factual and promotional elements.

E-commerce platforms also highlighted practical concerns. One key question was whether product listings created by sellers would fall within the requirement, as platforms may not be able to determine whether AI was used. If this is the case, the obligation to identify and label AI-generated content should reasonably apply on a best effort basis, as platforms may not have full technical visibility into whether individual sellers use AI tools in content creation.

They explained that AI in e-commerce is typically used to improve formatting or image quality without altering factual information, which may not warrant strict labelling. Respondents also requested clarity on where labels should appear and suggested allowing a reasonable transition period for system updates.

Question 5: AI-generated content is not automatically false; it is only considered false if it meets the Code's criteria for false content.

Addressing AI and False Content

Respondents shared a wide range of views on how AI-generated content should be treated. A strong majority (95%) agreed that AI-generated content should not

automatically be considered false, misleading, or harmful. Many, however, felt that clearer guidance would help users understand when AI-generated content crosses the threshold into falsity. A smaller group took the opposite view and felt that AI outputs should be treated as false until verified.

Several respondents pointed out that even when AI-generated content is not “factually false,” it may still produce harmful outcomes. This can occur when outputs reflect biased training data or misinterpret original sources. Some suggested including a “misleading or deceptive” threshold to capture content that creates false impressions without making explicit false claims.

A few respondents took a more cautious stance and felt that all AI-generated content is inherently artificial and therefore should be regarded as false. Others expressed concern that AI-generated material could be misused to deceive, manipulate, or slander individuals, which they felt underscores the importance of maintaining strong safeguards.

Question 6: Platforms that allow users to upload or share content should provide a function for users to label their content if it was generated or edited by AI.

The Requirement for Platform Tools to Label AI

Respondents largely (98.2%) supported requiring platforms to provide a function that allows users to label content that has been generated or edited by AI. Many felt this should be a mandatory feature, noting its importance for transparency, public trust, and preventing misleading information. Some also suggested that AI tools themselves should apply labels or watermarks before content is uploaded, with platforms maintaining those labels once the content is live.

Respondents proposed that labelling must remain simple and accessible for users. They also requested clearer guidance on whether AI labelling should be compulsory and what criteria determine when a label is needed. This included questions about partially AI-assisted work, AI-edited news articles, and commercial content uploaded to e-commerce platforms.

Respondents further highlighted the need to consider the operational realities of platforms that manage large volumes of user-generated content, particularly e-commerce sites. These platforms noted that they cannot technically verify whether every product listing or description is AI-generated. If e-commerce content is covered under the requirement, responsibility should lie with the user or seller uploading the material. Platforms also emphasised the need for a reasonable transition period to design, test, and integrate new labelling mechanisms. It was also suggested if users are empowered to self-declare AI-generated content, platforms should not be expected to independently verify or override those declarations, to avoid conflicting compliance requirements.

Question 7: Any reproduction, modification, or replication of copyrighted material for profit AI should only be allowed in compliance with Malaysian copyright and trademark laws, including the Copyright Act 1987.

On AI and Copyright Protection

Majority of respondents (97%) agreed that any AI reproduction, modification, or replication of copyrighted material for profit must comply with Malaysian copyright and trademark laws, particularly the Copyright Act 1987. Some respondents felt these rules should eventually align with any upcoming AI regulatory frameworks and reflect global standards. There were also calls for robust enforcement to support fair and consistent application.

Views on commercial usage were more mixed. Several respondents felt AI should not be used for profit at all, while others believed commercial use should be limited to licensed organisations with the appropriate rights to the underlying material. A smaller group agreed that AI may be used for profit as long as commercial practices respect the rights of original creators. A few also raised the concern that overly restrictive copyright rules could widen information gaps or slow economic growth.

Respondents also highlighted the risk of misleading advertising when AI-generated visuals portray products inaccurately, for example when a toy is promoted using AI-generated imagery that does not reflect the actual product. There were suggestions to allow limited, free AI features for educational purposes to support learning and access without compromising copyright protection.

Question 8: People who share, upload, or post AI-generated content remain responsible for that content. The fact that it was created by AI should not be a defence, since the act of sharing is still carried out by them.

The Issue of Personal Responsibility for AI Content

A majority of respondents (98.3%) supported this proposal. They agreed that AI does not reduce the responsibility users already have for accuracy, legality, and compliance with content standards. Many emphasised that sharing is an intentional act and that the prompts used to generate content originate from the user, which means users remain responsible for the final output. This approach was viewed as important in preventing the spread of false, harmful, or inappropriate material.

Several respondents, however, highlighted the importance of context. They believed the rule should recognise situations where individuals unintentionally share AI-generated or misleading content, especially in cases where they had no reasonable way of knowing the content's origin.

There were also concerns about the role of platforms. Some respondents felt platforms should share part of the responsibility by providing clear and visible AI labels, pop-up reminders, and straightforward tools to help users identify AI-generated material. Without these features, they argued, users cannot be held fully accountable. At the same time, several respondents cautioned against placing excessive liability on platforms, noting that platforms function primarily as intermediaries and should not be held directly responsible for AI-generated content uploaded by users. They expressed concern that expanding platform liability could lead to over-moderation, confusion, or unnecessary legal exposure. Instead, respondents suggested maintaining existing intermediary responsibilities, such as handling takedown requests and cooperating with lawful orders.

All these considerations on AI governance will be valuable for CMCF's plans to develop a detailed best-practice instrument on the use of AI in content, ensuring it reflects the nuances raised across the consultation.

3. Advertising and Consumer Protection

Question 9: Advertising rules should apply to advertisements shown on television, radio, and digital media when they target the Malaysian market, including ads from abroad aimed at Malaysian audiences.

Widening the Scope of Advertising

Many respondents (97.5%) supported applying advertising rules to television, radio,

and digital media when the content targets the Malaysian market, including advertisements originating from abroad. They felt that consistent rules across all platforms would help protect consumers from misleading or harmful messages, promote fair treatment between local and foreign advertisers, and strengthen public trust in advertising. Some respondents even suggested printed materials to be included, since they still exist and influence the public. Respondents also highlighted the importance of alignment with existing guidelines issued by agencies such as the Ministry of Domestic Trade and Costs of Living (KPDN) and the Ministry of Health to ensure consistency with national standards.

There was also strong support for firmer wording. Respondents preferred the use of “must,” noting that “should” appears optional and weakens compliance. Many also expressed the view that rules must apply to all internet users and remain applicable at all times.

A smaller portion of respondents disagreed with extending full regulation to digital media. They pointed out that digital platforms operate globally and cannot be fully controlled, and felt that consumers should exercise personal responsibility and judgment when engaging with digital advertisements. From this perspective, regulation was seen as more suitable for television, radio, and licensed OTT services, but less suitable for social media or dynamic digital feeds.

Respondents also called for clearer definitions and mechanisms. Several noted that the term “digital media” was too broad and should be supported by clearer examples such as mobile applications, in-game advertising, streaming platforms, and VR/AR environments. To avoid ambiguity, they suggested either defining the term more precisely or including illustrative examples such as “including but not limited to websites, social media, streaming platforms, mobile applications, and in-

game advertising.” Respondents also questioned how regulators would determine when a foreign advertisement is intended for Malaysian audiences, noting that limiting the rule only to ads intentionally aimed at Malaysians could create loopholes.

Another important point raised was the need to clearly separate “advertisements” from sponsored foreign programmes or product placements particularly those originating from global feeds. They emphasised that the rule should apply only to advertisements and should not include sponsored foreign programmes, which could otherwise be mistaken as indirect advertising. Concerns were also raised about the practical limitations of regulating ads from overseas. A few of respondents noted that foreign commercial advertisements can continue to be replaced according to existing industry procedures. Several also pointed out that some foreign ads are outside Malaysia’s direct control.

Question 10: Advertisements that use testimonials or endorsements mentioning professional expertise or qualifications should take reasonable steps to verify that such claims are accurate and recognised by the relevant professional or regulatory bodies.

Testimonials and Endorsements

Overall, respondents expressed strong support for proposal (98.6%). They agreed that statements from individuals who appear to have professional expertise carry significant weight, which makes it important to verify their qualifications. Verification was viewed as essential for preventing misleading information, protecting consumers, and reducing the risk of AI-generated or manipulated content being used to misrepresent or slander professionals.

Several respondents suggested replacing “should” with “must,” along with clear expectations for advertisers to maintain proof of qualifications and provide it when required. Respondents also noted instances where endorsements were used without permission and emphasised that no professional’s name, image, or statement should be used without proper approval.

Some respondents highlighted practical challenges in implementation, particularly in the medical field where differing medical opinions are common. This could make verification more complex for health-related claims. Views were also mixed on where the rule should apply. Many supported its application to television, radio, and OTT services, while some felt it may be less practical on social media. Others cautioned that excluding digital platforms could create loopholes and suggested that the rule apply consistently across all platforms to maintain fairness.

Question 11: If an ad says “guaranteed employment” (for example in training or sponsorship), the guarantee must be real and unconditional.

The Inclusion of Employment in Rules on Guaranteed Claims

Respondents shared a wide range of views on advertisements that include “guaranteed employment” claims. Many strongly supported this requirement (97.4%), noting that such claims must be truthful, genuine, and backed by solid proof. They emphasised the importance of protecting consumers, especially vulnerable groups such as job seekers, students, and migrants, from misleading promises or potential scams. Respondents also agreed that clear disclaimers are essential whenever conditions apply.

Several respondents noted that most genuine employment guarantees naturally come with basic requirements, such as completing a training programme, meeting

performance standards, or fulfilling sponsorship obligations. For this reason, they acknowledge that an entirely “unconditional” guarantee may not be practical and thus focus should be on ensuring that all conditions are reasonable, transparent, and clearly stated. A smaller portion of respondents recommended “guaranteed employment” claims should explicitly be allowed to include such terms and conditions, rather than being treated as unconditional.

A number of respondents highlighted the importance of aligning this guideline with the Consumer Protection Act 1999, which already defines express and implied guarantees for goods and services. They felt that using existing legal concepts would help avoid duplication or conflicting standards. Respondents also noted that in some industries, phrases such as “guaranteed delivery” or “guaranteed response” describe operational reliability rather than a legal promise. They suggested distinguishing between literal guarantees that create enforceable commitments and operational expressions that convey confidence within reasonable limits.

There were also broader regulatory observations. One respondent pointed out that advertisements are “invitations to treat,” which means issues surrounding guarantees may also fall within the broader context of contract and misrepresentation laws.

Question 12: Advertisements featuring children should follow strict safeguards: they must not show children using or promoting dangerous products without supervision, engaging in illegal or age-inappropriate activities, indulging in harmful behaviours, or being exploited for emotional effect.

Stronger Provisions Relating to Children in Ads

Respondents expressed strong support (98.4%) for having strict safeguards in advertisements featuring children. Many felt these protections are essential to prevent exploitation, emotional manipulation, and harmful influence, and that they reinforce responsible media practices that prioritise children's wellbeing. There was also support for maintaining a broad overarching statement so that similar risks can be covered even as new forms of advertising emerge.

Some respondents noted that the clause on emotional effect is currently too general. They suggested including specific examples, especially those that reflect local cultural or festive contexts where children are frequently featured.

Concerns were raised about the possibility of parents or guardians exploiting their children for commercial gain. Some respondents suggested looking at practices used overseas, such as requiring special permits for filming children, or limiting advertisements featuring children to suitable time slots. Questions were also raised about how safeguards would apply to AI-generated depictions of children. Respondents emphasised that the principle of preventing exploitation should remain the same even when a child is digitally created, including when using stock images or AI-generated visuals of children sourced online.

4. Online Platform Responsibilities

Question 13: Platforms should respect and enable end- users' ability to filter or control the content they access. While the specific tools or methods may differ across technologies, services, or platforms, the principle of giving users meaningful control must be upheld.

Provisions on Availability of User Controls

A majority of respondents (98.6%) supported giving users the ability to control or filter the content they access across platforms. Many viewed this as essential for personal comfort, digital safety, privacy, and mental well-being. Respondents highlighted the importance of making self-regulation tools easy to use, along with clearer reporting options. Empowering users in this way was seen as a core expectation of modern online services, and some noted that users should feel free to choose platforms that offer stronger control features.

A number of comments focused on children's safety. Respondents emphasised the need for stronger parental supervision tools that provide parents with full visibility over their children's accounts, and some hoped for legal measures to support this. Others pointed out the importance of strengthening awareness efforts, so parents understand how to use these tools effectively.

A respondent noted that while the principle fits naturally with social media and content-sharing platforms, e-commerce services function differently because their content is transactional rather than expressive. If user-control requirements are intended to apply across all platforms, respondents asked for clarity on how this would work in an e-commerce environment, where detailed filtering tools may affect search relevance, customer experience, and service quality. For these platforms, it was suggested that a more practical form of user control may involve managing notifications, personalisation settings, or recommendation preferences.

Respondents also highlighted the need for a reasonable implementation timeline, particularly for e-commerce services that would require significant technical adjustments to introduce new control tools. A proportionate, context-sensitive approach was encouraged to avoid unnecessary burdens on transactional

platforms while still supporting the broader goal of empowering users.

At this juncture it is worthwhile to note that, as a voluntary self-regulatory industry forum, the Content Code is developed and implemented with the principle of proportionality in mind. The provisions are not intended to place undue burdens on platforms or require measures beyond what is technically or operationally feasible. Implementation typically follows a tailored approach that takes into account the nature of each service, the type of content involved, and the practical realities of different platform models. Reasonable timelines are also taken into account to ensure that any required adjustments can be integrated in a manageable and sustainable manner. This approach helps strengthen user empowerment while remaining workable, balanced, and aligned with the capabilities of each platform.

Question 14: Platforms and services that are likely to be accessed by children should provide easy-to-use, age-appropriate tools such as screen time management and parental controls, to help parents or guardians guide, monitor, or limit their children's access to content.

The Requirement for Parental Controls and Child-Friendly Tools

Most respondents agreed (98.6%) that platforms accessed by children should provide simple and practical parental tools. Many viewed these features as necessary given the wide range of unsuitable content that children may encounter online. At the same time, respondents acknowledged practical challenges, noting that children today are highly tech-savvy and may bypass restrictions more easily than before.

Some respondents highlighted the importance of remaining aware of real-world risks on popular platforms for children. Concerns have been raised including issues

related to predators, weak moderation systems, and ongoing legal scrutiny surrounding platforms' safety.

There was strong agreement that platforms should offer built-in parental controls, screen-time limits, and monitoring features that are easy for parents to use. Some respondents felt that stricter approaches, similar to those implemented in China, could be beneficial. These include identity verification, usage-hour limits, and screen-time caps of one hour per day, which were viewed as potential ways to reduce exposure to harmful content.

Respondents stressed that these tools are only effective if parents are aware of them and understand how to use them, so platforms should proactively promote these features and provide clear guidance to parents.

Respondents also sought clearer guidance on how these requirements apply across different types of platforms, suggesting that a tailored approach would be appropriate so that requirements reflect the distinct functions and risk profiles of different platform categories.

Question 15: Platforms should only block user access to content when required by law or when directed by the Complaints Bureau under the Code's procedures, with the law prevailing if there is any inconsistency.

Content Blocking and Legal Processes

A majority of respondents (96.2%) supported this principle, noting that it promotes fair and transparent enforcement while protecting freedom of expression. Respondents felt that keeping content blocking tied to proper legal processes helps prevent misuse of authority and ensures enforcement remains consistent.

At the same time, some respondents felt the rule may be too restrictive in situations where urgent action is needed. They stressed that platforms should be able to respond swiftly when content is clearly harmful, especially when it involves children or suicide-related material. They cautioned that waiting for formal legal direction could allow such content to spread further and increase the risk of harm. Some respondents suggested blocking content when a significant number of public complaints are received, while others preferred empowering users to manage what appears on their own feeds. There were also calls to give page owners clearer authority to remove content and to ensure they can be contacted easily to resolve misunderstandings.

Respondents also sought clearer operational details, including whether blocking should occur immediately or within a set timeframe. While many supported safeguards against arbitrary removal, some expressed concern that the rule could still lead to excessive blocking if government directions are drafted too broadly.

5. Enhanced Protection of Children

Question 16: Those who create or produce children's content should comply with child protection laws, follow recognised classification standards and best practices, and take reasonable steps to ensure content is age-appropriate, avoids glorifying violence, and promotes positive values.

Content Design and Safety for Children

Respondents strongly supported this proposal (99.1%). Many noted that the way content is designed can influence children's emotions and development, and

suggested that children's media should be calm, sensory-friendly, and created in a way that does not overwhelm young viewers. Respondents also highlighted the value of clear speech and positive messaging in supporting children's language development, social skills, and cognitive growth.

There was a clear call to distinguish the responsibilities of content creators from those of platform providers. Respondents emphasised that creators and editors should be responsible for supervising materials, storylines, themes, and character portrayals. Platforms, which primarily act as intermediaries, should not be expected to make editorial decisions, as this could result in unnecessary censorship and unrealistic operational expectations.

Many respondents agreed that content aimed at children must uphold strong ethical and legal standards to protect young audiences from harmful influences. They supported avoiding the glorification of violence and suggested extending this to cover negative or antisocial behaviours. Some respondents felt that penalties for violations should be strict, given the priority placed on child protection. Others raised concerns about potential exploitation and noted that some countries, such as Australia, require official permits before photographing or filming children.

Transparency for parents and guardians was another recurring theme. Respondents suggested clearly labelling content that includes sensitive themes such as violence, sexual references, LGBT topics, or strong religious content. They noted that these themes are not inherently harmful, but clearer labelling enables families to make informed decisions about what is suitable for their children.

A final suggestion was to include an annex linking to UNESCO and UNICEF resources, as these international guidelines offer practical reference points for creating safe

and appropriate content for children.

Question 17: Platforms that do not directly create children’s content should still take reasonable steps within their technical ability to support child protection, such as enforcing community standards, moderating reported content, and providing filters or reporting channels.

Platform Support for Protection of Children

Respondents generally agreed (98.5%) that although platforms do not directly create children’s content, they should still take reasonable steps to protect young users. Many felt that platforms have a social duty to help keep children safe by enforcing community standards, moderating harmful or inappropriate content, and providing simple reporting tools. These measures were viewed as essential for reducing risks such as exploitation and unwanted exposure to harmful material.

Several respondents said platforms should be given clear guidelines to ensure they fully understand their responsibilities. This would help avoid inconsistencies and make it easier for platforms to follow the expected standards.

A few respondents also highlighted practical challenges, noting that stronger child-protection measures can be costly and operationally complex to implement. They observed that platforms often operate across multiple layers of processes and cautioned against applying blanket penalties in situations where platforms face reasonable limitations despite making genuine efforts to comply.

Respondents stressed to clarify what is meant by “support compliance” when the Code.

In the draft, Code Subjects who are not directly involved in the creation of Children’s

Content to take reasonable steps consistent with their role to “support compliance,” but it’s unclear what is meant by “support compliance”. Respondents stressed this phrased should be clarify clearly in terms of their obligation to take reasonable and proportionate steps to protect children from accessing content and services that are harmful or not age-appropriate.

In addition to “visibility filters or similar tools to limit children’s exposure to unsuitable material,” respondents suggested platform should be required to provide children and their parents with a range of tools that enable them to manage children's safety and minimise children’s exposure to harmful contact or interactions. This includes blocking and muting controls, easily accessible opt-out functions, the ability to limit the public visibility of children’s accounts and to limit who can contact and/or interact with children’s accounts, and limits on location sharing.

Question 18: Children’s personal data can only be used for commercial purposes with clear parental or guardian consent, and platforms should provide child-appropriate privacy settings to protect children’s rights.

Protection of Children’s Data

Respondents strongly (98.1%) agreed that children’s personal data deserves the highest level of protection. Many recommended aligning the Code more closely with the Personal Data Protection Act 2010 so that standards remain consistent with Malaysian law. Respondents generally felt that children’s data should never be used for commercial purposes, even with parental consent, due to risks of manipulation and inappropriate targeting. Some called for a full prohibition on commercial use, with only limited exceptions for legitimate research. Others supported a consent-based approach but stressed that privacy settings must be

easy to understand, straightforward to use, and designed with children's needs in mind.

Concerns were raised about how consent works in practice. Respondents worried that consent could be misused by guardians or informal caregivers and highlighted the need for better education for both parents and children on privacy and data rights. Age misrepresentation was also mentioned as a recurring issue. Many noted that children often input false ages to access online services, making meaningful verification, and genuine parental or guardian consent, more difficult.

Some respondents highlighted that platform responsibilities differ across service types. For instance, e-commerce platforms operate in a verified transactional environment and do not target children. When user-generated listings feature images of children, respondents felt the duty to obtain parental consent should lie with the sellers or content creators, as the platform acts only as an intermediary and cannot verify consent directly.

While a respondent suggested that child-specific privacy settings should not be imposed on e-commerce platforms, as these features are not directly relevant to how such services operate, others emphasised that all platforms—regardless of type—should maintain strong child-protection safeguards, including moderating inappropriate content, enforcing community standards, and providing accessible reporting tools.

Respondents felt that the safeguards around children's data could be strengthened. They noted that profiling tools should be off by default and that international best practices increasingly discourage—or even prohibit—the profiling of children for commercial purposes. They also observed that providing

child-appropriate privacy settings and limiting data collection are currently framed as “encouraged,” rather than required, and felt that clearer, firmer expectations would better reflect the duty of care owed to young users.

Question 19: Strong measures are needed to prevent and respond to Child Sexual Abuse Material (CSAM), including AI-generated images. These measures may involve clear terms of use, detection and blocking tools, accessible child-friendly reporting channels, prompt removal of harmful content, and timely cooperation with law enforcement.

Child Sexual Abuse Material (CSAM)

Respondents showed very strong support (99.5 percent) for firm action against Child Sexual Abuse Material (CSAM). Many recommended that the Code provide clearer and more complete definitions, particularly the definition drawn from the Sexual Offences Against Children Act 2017 (SOACA). They observed that the draft Code focuses mainly on the different forms CSAM can take and suggested that the key elements of the SOACA definition be included directly to avoid unnecessary cross-referencing.

There was broad agreement that CSAM requires strict enforcement, supported by strong legal action against offenders. Several respondents highlighted the growing risk of AI-generated CSAM and called for stronger monitoring systems, effective detection tools, and rapid removal processes. Some proposed benchmarks such as a 24 to 48 hour response time for takedown. Others suggested allowing platforms to block content immediately if it is suspected to be CSAM, with restoration only after verification.

For AI-related risks, respondents stressed the need for Code Subjects that deploy

AI systems to take reasonable steps to prevent these systems from being used to produce, disseminate, recommend, or amplify CSAM. They felt that a general prohibition on “encouraging” CSAM is insufficient without a clear responsibility to prevent AI misuse.

Respondents also supported simple, safe and accessible channels for reporting CSAM, including channels that children can use without fear or difficulty, with calls for clearer explanation of what “child-friendly channels” means.

Given the rapid rise of AI-generated CSAM globally, respondents recommended that the definition of CSAM explicitly include AI-generated or digitally created material. They noted that while the Code addresses this in some parts, the definition is not consistently reflected throughout, and clearer alignment would help ensure a uniform and unambiguous standard.

6. Inclusivity, Vulnerable Communities, and Human Rights

Question 20: The revised Code strengthens its commitment to diversity by explicitly including that content standards should require fair and respectful representation of all groups, including those defined by migration status and indigenous heritage.

Diversity Commitment

Most of the respondents agreed (98.7%) with the proposal. Some, however, felt that the phrase “all groups” was too broad and should be clarified. A number of respondents noted that the Code already protects groups based on “origin” and questioned whether additional categories were necessary. Others commented that the current wording is still vague and would benefit from clearer definitions to

avoid uncertainty.

Some respondents recommended that the Code more clearly outline the responsibility of media, platforms and content creators to promote social cohesion, prevent hateful or divisive content, and safeguard vulnerable communities.

At the same time, several cautioned that such changes should not lead to excessive regulation or undue interference in content decisions.

Question 21: Content should use accurate, respectful, and inclusive language when referring to Persons with Disabilities, in line with cultural context, the Persons with Disabilities Act 2008, and international standards.

On Disability-Inclusive Language

Majority of respondents (99.2%) agreed respectful and inclusive language should be used when referring to Persons with Disabilities. Some respondents, however, asked for a simple explanation of what “inclusive language” means so that expectations are clear for all Code Subjects.

Several respondents noted that preferred terminology can differ across cultures and may evolve over time. They felt the Code should remain flexible and allow content creators to use language that upholds dignity while still reflecting local cultural context and the preferences of disability communities. There were also concerns about unintentionally over-regulating creative content, particularly dialogue, which could limit natural expression. Some respondents felt that strict control over individual words is neither practical nor beneficial. They also pointed out that certain phrases or idioms are widely used without any intention to insult Persons with Disabilities and should not be automatically prohibited.

This feedback provides valuable support for the upcoming development of the Disability-Inclusive Language Guidelines, which will address these issues in more detail. The Guidelines are planned for release at the end of 2025 and will help ensure clearer, practical and culturally grounded guidance for all content creators.

Question 22: Content should represent migrant, refugee, stateless, and other vulnerable communities fairly and accurately. It should avoid language or imagery that is dehumanising, inflammatory, or suggests criminality.

Representation of Vulnerable Communities

A large majority of respondents (97.8 percent) agreed with the proposal, although there were differing views on how migrants, refugees, stateless persons and other vulnerable groups should be represented in content. Many supported the principle of fair and accurate portrayal, noting that respectful representation helps prevent stigma, promotes empathy and aligns with Malaysia's values of dignity and compassion. They agreed that content should avoid dehumanising or inflammatory language, including racist, xenophobic, misleading or inciting messages. Some respondents also pointed out that harmful innuendos and implied language should be addressed, since subtle wording is often used to spread negative narratives. There was strong support for ensuring privacy, consent and proper context when portraying these communities, as well as encouraging media and platforms to promote social cohesion while avoiding hateful or divisive content.

At the same time, several respondents expressed concerns about over-regulation. They felt the guideline might be too broad and could interfere with creative work or be applied unfairly to both migrants and content creators. Many also raised

questions about crime reporting, stating that factual information should not be withheld if a migrant individual is legitimately involved in an offence. They noted that the expectation of accuracy should be clearer, especially in fictional content, where negative traits may appear for storytelling purposes, such as highlighting prejudice or promoting greater understanding. Some felt that open discussion of problematic behaviour should be allowed if it contributes to addressing real community issues.

7. Code Structure, Enforcement, and Accessibility

Question 23: The Complaints Bureau may now accept complaints up to 12 months after publication, if the material is still publicly accessible and raises issues of ongoing harm, accuracy, or privacy. It may also accept late complaints on reasonable grounds, such as cases involving minors or matters of strong public interest.

Extension of Complaint Timeline

Most respondents supported the extension (96.5 percent). Many favoured a flexible approach that allows complaints to be filed beyond the standard period, especially when the content remains accessible and continues to cause harm, involves minors or relates to matters of strong public interest. They felt this approach strengthens accountability and protects individuals from ongoing harm or privacy concerns. Some respondents recommended longer time frames in certain cases, noting that harmful material can continue to cause impact well beyond the usual limits, depending on the seriousness and relevance of the situation.

There were mixed but constructive views on the proposed time frames for filing complaints with the Complaints Bureau. Respondents suggested different limits such as two months, six months and twelve months, while some preferred shorter

periods such as three or six months.

A significant concern was the increasing trend of old content going viral again. Respondents highlighted the difficulty of handling cases where content resurfaces long after its original publication, especially when it has been deleted and later reuploaded by someone else. They asked for clarity on who should be held responsible in these situations. Many suggested that if a third party republishes or redistributes the content, the responsibility should lie with that individual. Some proposed that the rule be framed around “after publication or resharing” to reflect how content is circulated online.

Respondents also noted that public interpretation of content can change over time, and any late complaints should take into account the original context and intent. They cautioned against decisions that are influenced solely by public pressure.

Some respondents also raised questions about how the provision would apply to content that remains online but is set to private or limited view. They further highlighted the need for greater clarity on what constitutes “public interest,” including who determines it and how broadly that interest should be understood.

There were recommendations for a simple and accessible complaint system. Respondents asked for a process with minimal bureaucracy, wider public awareness similar to scam hotlines and clear updates to complainants on the actions taken.

Question 24: The Complaints Bureau shall ensure fairness by ensuring all parties have the right to be heard, access to sufficient information, and the ability to appeal or request a review under the Code. If a party is still dissatisfied after these steps, they retain the right to seek redress under the law, including judicial review.

Clarification of Appeal Process

Most respondents agreed (98.7%). Some welcomed the idea, noting that the process can help strengthen trust, transparency and accountability.

Several respondents raised legal concerns. They were uncertain whether the provision could affect the right to legal defence. Others questioned whether it might weaken the existing protection in the Code that prevents parties from being exposed to certain legal proceedings. These respondents felt that the potential impact on current safeguards should be clarified.

Question 25: To strengthen transparency and trust in the industry, the Content Forum may publish compliance advisories and anonymised summaries of repeated or serious breaches of the Code. These advisories are issued as guidance for industry stakeholders and do not carry legal consequences.

Transparency

A large proportion of respondents supported (98%) this proposal. Many felt that parties who repeatedly or seriously breach the Code should be identified, as naming offenders would help the public stay cautious and give other stakeholders better awareness when deciding whether to collaborate or engage with them.

Some respondents argued that anonymity may protect offenders unnecessarily. They suggested that names should be disclosed, particularly when breaches occur three times or more. Others called for stronger consequences beyond advisories, noting that repeated or ongoing breaches should lead to formal corrective measures to prevent recurrence.

Several respondents highlighted the importance of ensuring that advisories are consistently visible and easy to access. Regular publication was viewed as a valuable way to help platforms and creators stay informed and refer to relevant guidance whenever needed.

At the same time, some respondents supported anonymised advisories. They felt that anonymised reports can still promote accountability, improve industry standards and encourage better self-regulation, without causing reputational harm.

8. Additional Issues Raised

a. Supporting the Content Code's light-touch approach

Respondents generally supported the light-touch approach. Voluntary compliance was seen as effective and aligned with current consumer expectations. Many felt this model remains suitable for VOD services, where content is curated, licensed and fully managed by the service provider. They noted that users have meaningful control over what they watch and can choose what is appropriate for themselves and their families.

b. Strengthen Guidance for Gaming Platforms

There was strong support for clearer guidance on gaming platforms. Respondents highlighted that many children spend significant time gaming

and interacting with strangers or peers online. They stressed that gaming environments should not be overlooked, as risks such as harmful interactions, unsafe language and exposure to inappropriate content can arise easily. A dedicated guideline was recommended to address these concerns more effectively and provide stronger safeguards for children who engage in gaming activities.

c. Tackling Online Harmful Content – Online Curated Content (OCC) Platforms

Respondents noted that OCC platforms already operate established complaint channels and designated contact points under CMCF's 2023 OCC Guidelines. Some concerns were raised about the draft requirement for platforms to take immediate action upon user reports or trusted flagger alerts, including temporary removal or restriction of content. Respondents shared that this proposal does not reflect current operational practices among OCC providers and may require reconsideration.

d. Children's Online Safety Sub Code

Respondents agreed that any future development of a sub-code on children's online safety should involve meaningful consultation with the industry. They emphasised the need to avoid unintended technical obligations that may be difficult to implement or that introduce unnecessary burdens on providers. A consultative process was seen as essential to ensure practical, workable and effective standards.

e. Standardisation of Definitions and Interpretations

Respondents highlighted the need to ensure that definitions and interpretations used in the Content Code are aligned with the Communications and Multimedia (Licensing) Regulations 2000. They noted that certain terms

are not applied consistently, particularly in relation to the Application Service Provider Class Licence (ASP(C)). Standardising these terms was seen as important to promote clarity, ensure regulatory consistency, and avoid confusion among industry stakeholders

f. Consolidation of Child-Related Provisions

Respondents recommended consolidating the various child-related provisions in the Content Code into a single, dedicated Part on Child Protection. They felt that bringing these requirements together would provide clearer guidance on the obligations of Code Subjects towards children, particularly for services and content that children are likely to access. A unified approach was seen as more coherent and user-friendly, while remaining separate from the obligations relating to content specifically designed and classified for children.

C. NEXT STEPS

The feedback gathered through this extensive consultation will be carefully reviewed to refine, strengthen and clarify the draft Content Code. Once the Working Group agrees on the proposed enhancements, the revised draft will undergo a final legal and technical review to ensure accuracy, coherence and full alignment with the national regulatory framework. After these steps are completed, the finalised Content Code will be submitted to the Malaysian Communications and Multimedia Commission (MCMC) for registration, marking an important milestone in our ongoing effort to build a safer, more responsible and forward-looking content ecosystem for Malaysia.

In addition, certain areas of feedback will inform the development of ancillary instruments that provide more detailed, practical direction. These instruments will be read together with the Content Code and are intended to address technical or

context-specific matters that warrant deeper treatment beyond what is appropriate for the Code itself.