

APPG on  
Social Media



### **All-Party Parliamentary Group on Social Media meeting**

**Wednesday 6 July 2022: child protection and the Online Safety Bill**

#### **Attendees:**

Luke Pollard MP, Co-Chair of the All-Party Parliamentary Group on Social Media  
Lord Bethell  
Baroness Stowell  
Richard Holden MP  
Ella Murphy, assistant to Aaron Bell MP, Co-Chair of the All-Party Parliamentary Group on Social Media  
Lucy Cserna, assistant to Sarah Champion MP  
Orla Macrae, Deputy Director, Online Harms Regulation, DCMS  
Felix Szabó, Assistant Private Secretary, DCMS

#### **Speakers:**

Minister Chris Philp MP  
Susie Hargreaves, CEO, Internet Watch Foundation  
Jessica McBeath, Online Safety Consultant, South West Grid for Learning  
Jessica Asato, Head of Policy and Public Affairs, Barnardo's

#### **Secretariat**

Abigail Fedorovsky, Policy and Public Affairs Officer, Internet Watch Foundation and UK Safer Internet Centre

#### **1. Opening Remarks – Luke Pollard MP**

Luke welcomed everyone to the meeting, and stated the meeting was an opportunity for the Group to raise points that they would like included in the Online Safety Bill. The Group are grateful to the secretariat for their work.

Luke asked each speaker and attendee to introduce themselves, then each speaker had five minutes to make their opening statements.

## **2. Opening Statement from Jessica Asato, Barnardo's**

Jess spoke about how the Online Safety Bill is a vital opportunity to protect children and adults. Barnardo's are pleased that the Government has included a duty to ensure children cannot access regulated pornographic content through introducing age verification. They would want to see a commitment for the parts of the Bill relating to pornography to have a swift introduction.

However, Barnardo's do not think the Bill does enough to regulate harm from pornography on all sites, especially because it can be shared from commercial websites.

Barnardo's have a long history of supporting children: they know children face threats on a daily basis. Watching pornography can affect children's attitudes to pornography and consent. Barnardo's see that watching this type of content harms children's mental health. Many sites carry content that would meet the criminal threshold for prosecution e.g., rape or incest. 88% of scenes in online pornography show aggression and 94% of these are directed at women.

Jess shared the real-life stories of a few children, including one boy who is addicted to watching pornography and has sexual fantasies of harming young girls.

Some children also view pornography to understand their own sexual abuse. However, because the content normalises abuse, this is very harmful. For instance, lots of pornographic content shows sexual relationships within stepfamilies.

Why isn't age verification enough to address this issue? Some determined teenagers will get around age verification and continue to see violent pornography. Pornography is also being viewed inadvertently by children on social media who are seeing it by accident (many Snapchat and Instagram accounts post teasers.)

The legislation gives user to user platforms the option of age verification, but only for sites that expect children to be the main users of their sites.

Jess spoke about how a key concern for them was also the impact on children when adults view pornography. Actors are made to look younger, which is harmful and normalises the sexualisation of children (driving a demand for child sexual abuse.) Mainstream pornography is sometimes a gateway to watching child sexual abuse material. It can also contribute to violence against women and girls.

The draft proposals do not address the widespread availability of harmful pornography. There are other solutions, for instance there was a significant impact in 2019 when PayPal, Mastercard and others stopped processing payments for Pornhub.

This must be addressed: the Ofcom reported that during the pandemic, Pornhub had a bigger audience than the BBC. Barnardo's have drafted some amendments to the Bill alongside the Centre to End All Sexual Exploitation (CEASE.)

### **3. Opening Statement from Susie Hargreaves, Internet Watch Foundation**

Susie opened by introducing the Internet Watch Foundation (IWF), the UK hotline for reporting and removing child sexual abuse material (CSAM.)

The IWF is supportive of the Online Safety Bill and has been working with the Government for five years to make it work. Susie thanked the Minister and the members of the Public Bill Committee for all of their work.

However, Susie highlighted concerns about the role of the IWF in the regulatory environment. The IWF has been held up as a model of good practice, both in the UK but also around the world (just last week the IWF was referred to as a “super-hotline.”) The IWF removes more content every year: in 2021, this was 252,000 webpages showing CSAM which equates to millions and millions of images. The IWF provides 2.4 billion people with a place to report. Also, in 2021 they assessed over a million images for the UK Child Abuse Database (CAID.)

The IWF delivers services to companies across the globe, including a hash list which contains 1.4 million images. Each year the IWF publishes data that is used globally. They were the first organisation to highlight the growing trend of “self-generated” abuse, which now makes up 70% of the content being removed.

Susie then spoke about the Bill. Ofcom published their roadmap today which plans to make a very ambitious start. In the first 100 days they want to publish the CSEA code of practice, draft guidelines on illegal content risk assessment, transparency reporting, etc.

Ofcom will need the IWF’s support and support from other organisations, especially when it comes to removing CSAM. It is not confirmed what the role of the IWF will be, or how Ofcom and the IWF will work together.

During the Public Bill Committee, the Minister acknowledged that the IWF, Ofcom and law enforcement already work well together and this needs to continue. The IWF already helped draft the interim code of practice.

Susie spoke about how the internet industry already takes the IWF’s quality assured data which complies with UK law. If Ofcom want to partner with other organisations, this will take time to upscale so decisions need to happen now. Susie spoke about the incredible work of the IWF analysts who deal with some of the most difficult content in the world every day. It is important for them to have certainty and for their service to be acknowledged.

In conclusion, Susie spoke about how the Independent Inquiry into Child Sexual Abuse talked about how the IWF sits at the heart of dealing with CSAM in the UK, and is a significant reason why such little content is hosted in the UK (less than 0.1%, compared with 90% in the rest of Europe.) The IWF would like to see formal co-designation, and their contribution acknowledged.

#### **4. Opening Statement from Jess McBeath, South West Grid for Learning**

South West Grid for Learning (SWGfL) aim for people to be online, but also to be safe at the same time.

At the moment, if a user has a negative experience online, they can come to SWGfL's helplines, including Revenge Porn and Report Harmful Content. They will triage reports and speak to the companies and have a 96% success rate.

SWGfL is a trusted flagger and, in 9/10 cases, will get content removed.

Jess spoke about how important it is for users to have an independent process they can go to once they've exhausted talking to the platform. The Online Harms whitepaper talked about how independent review mechanisms might be appropriate. The Joint Committee said that external redress mechanisms would allow providers to be held to account. SWGfL have written to the Secretary of State Nadine Dorries asking for an individual complaints mechanisms for children.

However, this is not included in the Bill. Instead, users must continually report any problems to the company. Jess spoke about how this is potentially not included because it is a big and difficult problem, as lots of people might want to submit complaints.

There is an alternative process for "super complaints" where a group of people can make a complaint, but there are no mechanisms for individuals. The individual's voice is being lost.

It is very clear from Ofcom's roadmap that they will not be dealing with individual complaints. However, the public perception of the Bill is that it will fix problems online. They are expecting that they can go to someone and get their issue fixed.

When thinking about the individual, research shows that online risk is different for different people. Research with teenagers shows that young people with care experience are eight times more likely to have seen self-harm content, five times more likely to have seen racist content and five times more likely to fall for a scam.

Jess is concerned that, when thinking about the most vulnerable people in society, it is important to have an individual complaints mechanism.

The Report Harmful Content already works with 26 providers. The Bill is going to dismantle something that is already in place through the Video Sharing Platform regime. A variety of video sharing platforms are already required to have an impartial dispute resolution process.

Jess concluded by saying that just because something is a big problem, doesn't mean we shouldn't do something about it.

#### **Minister Chris Philp**

Minister Philp started by thanking all speakers and attendees for their work and engagement with the Online Safety Bill. The Public Bill Committee has just concluded 40-50 hours thinking about the Bill.

The legislation is a huge step forward, not perfect, but a huge step forward for protecting children. He highlighted that the Government has tabled further amendments yesterday evening, including sharpening up the definition of illegal content to make it clearer for platforms to determine what they should remove.

They have widened the definition to include content that might constitute preparatory activity. They will be delivering their promise to introduce a right of appeal for news media content.

They have included amendments around scanning for authorised technologies for CSEA. He is concerned about the use of encryption and the possible impact on scanning. There is nothing more important than making sure platforms can detect CSEA content. The amendments add to Ofcom's powers – they require companies to use “best endeavours” to develop new technologies. This will require companies to make design choices to accommodate accredited technologies and could mandate not using end-to-end encryption (in extreme circumstances.) Privacy is important, but not to the extent of not catching paedophiles.

He concluded by saying that there are a few things to be set out in written ministerial statements in the next two or three days where Government are hoping to make progress.

**Question from Susie to the Minister: Ofcom have published their roadmap this morning. They are hoping to achieve a lot in relation to CSEA in the first 100 days. However, there is still no defined role for IWF. We don't have certainty right now. We would like to see some clarification.**

**Minister Philp** replied that the Government do acknowledge the huge amount of work done by the IWF and think that it is doing amazing work. There are powers in the Bill for Ofcom to delegate some work and effectively co-opt organisations for some work.

It would be quite unusual to name a non-governmental organisation on the face of the Bill.

Ofcom must consult with those who represent interests of children.

It is a tricky line because Ofcom are independent so need to have discussions without Governmental interference. However, the Minister can raise this with Ofcom.

**Question from Jess Asato: Barnardo's are worried about the length of time it could take for adult content provisions to be implemented.**

**Minister Philp** replied that this is set out in the Ofcom roadmap.

**Jess Asato: They are also worried about the impact of adults watching pornography on children, and that the BBFC will not be consulted by Ofcom.**

**Minister Philp** replied that it is worth reminding everyone that the Bill specifies that extreme forms of pornography are illegal and named as priority illegal content, so platforms have to proactively have that content removed from the internet.

He acknowledged that there is content that is not illegal but would not be licensed by the BBFC. It is difficult to deal with this. One suggestion would be to list this as legal but harmful harms. This will not be included in the Commons amendments in time but could be considered by the Lords.

**Lord Bethell thanked Chris Philp for the work on age verification, but said he feels the measures don't quite meet expectations.**

Lord Bethell said that the technology for using artificial intelligence to assess the age of a user is completely short of credibility. He pointed out that the gambling industry has done a lot to get young people off gambling, so the Government should consider copying some of this.

**Ella Murphy said that her MP Aaron Bell completely agrees with Lord Bethell about age verification measures and is concerned about this pushing users into the dark web.**

**Jess Asato** replied that when Barnardo's have looked at this issue, they did not find any evidence that children would be pushed into the dark web. Under 10s are mostly not searching for pornography but are accidentally seeing it. A large chunk of young people do abide by the rules.

The number of users who are likely to seek content elsewhere if they cannot view it is quite low. Barnardo's feels that even if they can dent the numbers a bit, this would dramatically improve the lives of many children.

They know sex and pornography addiction is massively increasing. There should be excellent advice and services around this, so children can get the support they need.

**Susie Hargreaves** commented that in the IWF's work, the biggest group affected by "self-generated" abuse is 11-13-year-old girls, but the fastest growing group is 7-10-year-old girls.

**Lucy Cserna said that one of the key concerns of her MP Sarah Champion is that children are learning about sex and consent in unhealthy ways via pornography rather than through the RSE curriculum being implemented effectively in schools.**

**Jess McBeath** commented that teachers and schools professionals can call the SWGfL Professionals Online Safety Helpline if they need help. They get many requests for training and materials. There are not many providers that will provide training relating to harmful sexual behaviour online.

Primary school children do not have educational materials that address children displaying harmful sexual behaviour.

Jess pointed out that when we talk about education, it is important to talk about the whole of the UK, including the devolved administrations.

It is also important to consider where young people can go if they want to talk about sexual behaviour. Many will not talk to their parents.

**Lucy spoke about how Sarah is concerned about the mental health and support for online content moderators. It seems like a very tough job.**

**Susie** replied that the IWF has gold-start support for its analysts. They have compulsory counselling and psychological assessments. They have regular breaks every hour and a very stringent recruitment process.

However, not every organisation has good support in place. The IWF's analysts are only looking at CSAM, but lots of social media moderators are looking at a very wide spectrum. It must be distressing to jump from one thing to another.

Sometimes the analysts do see things that really upset them, but in a way, it's bad if someone becomes very immune to it.

Susie added that uncertainty is another added stress for moderators, which is why she's pushing so hard on clarity about the IWF's role.

She pointed out that lots of police do not even have the level of support they need.

The IWF is very happy to share their processes.

She concluded by saying that no technology in the world can accurately age a child. It is getting better, but everything the IWF acts on has been moderated by at least two humans.

**Jess Asato** mentioned a recent article by an anonymous Pornhub moderator. They clearly do not get very much support at all. The person spoke about the huge impact on their mental health.

Jess asked how we can rely on companies who are hiring people with low pay and few breaks, and with little specialised training. This is not being addressed in the Bill.

In relation to Jess' point about an impartial resolution process, Ella spoke about how MP's assistants see first-hand that processes do go wrong, and people look for an authority to make the argument for them.

**Luke Pollard MP** concluded the session by saying that he and his Co-Chair Aaron Bell MP could put some PQs on the record from the session with the key points raised. He thanked everyone for coming.