



All-Party Parliamentary Group for Online Safety on Social Media Meeting

AGM & Stop National Child Exploitation Awareness Day Roundtable

Wednesday 20th March 2024, 16:00 – 17:00

Room B, 1 Parliament Street and via Microsoft Teams

Speakers: Sheila Taylor MBE (CEO, NWG Network), Sir Peter Wanless (CEO, NSPCC), Frances Frost (Director of Policy and Advocacy Lucy Faithfull Foundation), Rhiannon Faye-Macdonald (Head of Advocacy, Marie Collins Foundation).

Members of Parliament and Peers in attendance: Rt Hon Vicky Ford MP (Chair), Adam Afriyie MP, Kit Malthouse MP, Sir Paul Beresford MP, Peter Gibson MP, Lord Hampton, the Bishop of Manchester and Sarah Cooper-Lesadd (the office of Rt Hon Vicky Ford MP).

Secretariat: Michael Tunks, Bobbie Dennis (UK Safer Internet Centre/Internet Watch Foundation)

External Attendees: Rani Govender (NSPCC), Eleanor Linsell (WeProtect), Konstantinos Papachristou (UK Safer Internet Centre)

1. Annual General Meeting

- 1.1. Rt Hon Vicky Ford MP (Chair) welcomed the attendees to the meeting.
- 1.2. The Chair advised the Group that she would like to continue her role as Chair, and the Group agreed.
- 1.3. Lord Lipsey (Secretary), Luke Pollard (Vice Chair), and Caroline Dinenage (Vice Chair) to remain in their roles.
- 1.4. The Chair nominated the UK Safer Internet Centre to remain as the secretariat, and the Group unanimously agreed.

2. Opening Remarks – Rt Hon Vicky Ford MP

- 2.1. The Chair informed the group that she had tabled two amendments to the Criminal Justice Bill to target the gaps in legislation concerning sexual abuse material (CSAM) generated by artificial intelligence (AI), as identified by the Internet Watch Foundation (IWF).
- 2.2. The first amendment seeks to expand the existing offence of possessing guides that help paedophiles exchange hints and tips on how to sexually abuse children. The law as currently drafted, does not cover the exchange of hints and tips about the creation of “pseudo” (or AI-generated) images. As a result, paedophiles exchanging hints and tips on how to use text-to-image-based AI tools to create indecent images of children would not be committing an offence.
- 2.3. The second amendment creates a new offence of “simulating sexual activity with a child”. Under current law, it is an offence for anyone to communicate sexually with a child. This new offence I am proposing, would make it illegal for anyone to use, create, or share a tool online to simulate the current offence of sexual communication with a child. The concern is that “chatbots”, which have been created to simulate conversations using AI, could be used to encourage people with a sexual interest in children to act on those impulses. The purpose of this amendment is to prevent the circulation of these tools online and seek to make it a criminal offence for anyone to engage with these tools.
- 2.4. The Chair said it was important to have clear laws about these issues. She acknowledged that the amendments may not get called by the speaker, but said that it would be helpful to achieve a good level of support on these probing amendments to help convince members of the House of Lords to take them up.
- 2.5. Sir Paul Beresford MP asked if the issue was covered by the Coroners and Justice Act 2009, which regulated non-photographic images of children. Michael Tunks responded that there remained a gap in legislation concerning paedophile manuals, as the 2015 Serious Crime Act does not cover pseudo images of children, meaning possessing an online manual for AI-generated content is not currently illegal. While the amendment could be turned down, the IWF was hearing positive noises.
- 2.6. Adam Afriyie MP asked about the process of creating AI models and the duties imposed on software manufacturers to ensure that the software cannot create AI CSAM. The IWF highlighted that Baroness Kidron had tabled an amendment to the Data Protection and Digital Information Bill to make it an offence to use personal data or digital information to create digital models or files that facilitate the creation of AI or computer-generated CSAM. The IWF was looking at the amendment and wanted to challenge open-source models.
- 2.7. Sir Paul Beresford MP said Lord Dave Marshall was on the team responsible for crafting the grooming provisions in the 2003 Act. He then passed the responsibility to the police minister, overseeing the drafting of the Child Criminal Exploitation Bill - also known as the Fagon Bill - which aimed to address children carrying weapons or engaging in crime and grooming for terrorist purposes. The majority agreed with the proposal except for Ft Hon Alex Chalk MP, who argued that it was already covered under serious crime

legislation from 2009. Chalk's viewpoint was supported by other legal experts. However, Sir Paul insisted on the necessity for child-specific provisions, which would apply broadly and not only to adults, garnering support from law enforcement agencies. He said he wanted to contact Chris Philp to support.

- 2.8. The Chair said the APPG would draft an email to Chris Philp, explaining that Sir Paul had raised the issue at its child exploitation roundtable and highlighting the group's support.
- 2.9. The Chair informed the group of the APPG's symposium on Safer Internet Day where the Group heard from bereaved parents, children, and online safety experts about their online experiences. The action points included requiring telecom providers and device manufacturers to share online safety advice and information about parental controls at the point of sale. The Chair said that she planned to meet with Rt Hon Michelle Donelan MP to discuss and would consider tabling a 10-minute rule Bill to raise the profile of the issue. Lord Hampton agreed that parental control information would be useful.
- 2.10. Peter Gibson MP informed the group that he was working with local trading standards on the sale of illegal vapes. Children are being exploited and used as mules to carry illegal products and sell the vapes to their friends. He said that a young person in his constituency was groomed for sex using the enticement of illegal vapes. Darlington's local constabulary has been using anti-money laundering to get behind the issue. He had tabled a Westminster Hall debate and engaged with the Health Minister, yet felt his concerns went unheard.
- 2.11. The Chair suggested that the issue could be tabled as a Criminal Justice Bill Amendment and said colleagues would support it.

3. Remarks from Sheila Taylor MBE (CEO, NWG Network)

- 3.1. Shelia said that Monday 18 March was CSA Awareness Day, which was organised by the NWG Network. She noted that the NWG Network conducted awareness sessions in almost every area in the UK, including Northern Ireland, Jersey, and Guernsey. Additionally, 4000 local authorities downloaded packages to spread awareness of the day. She expressed gratitude for the APPG acknowledging the day and its significance.
- 3.2. Shelia highlighted the need to bridge the gap between online and in-person contact offending, stating that children's online and offline environments are essentially the same. She emphasised that treating contact offences differently from online offences leads to unreasonable expectations on parents and children to protect themselves, especially considering their lack of capacity and knowledge. She praised the NSPCC for providing useful resources on making online spaces safer, particularly focusing on parents and carers, but pointed out a lack of similar emphasis and educational resources for children and young people. She stressed the burden placed on schools, which are expected to know about everything and often feel overwhelmed. Shelia highlighted the importance of providing more support to schools, as they are often the first to notice changes in behaviour but lack adequate assistance.

- 3.3. Shelia also addressed the missed opportunities by professionals to disrupt and tackle online grooming, noting that online aspects are often overlooked in assessments despite their significance. She argued that there's little point in conducting work if both online and offline aspects are not integrated. She highlighted the lack of understanding surrounding neurodiversity and social isolation, which can make individuals vulnerable, particularly in rural areas where engagement is primarily online. She stressed the need to address perpetrator behaviour and disrupt activities at the ground level when cases are identified.
- 3.4. Shelia mentioned her work with 40,000 practitioners annually and a network of over 20,000, suggesting that discussions about topics like vaping could add value to arguments and warrant further exploration.

4. Remarks from Sir Peter Wanless (CEO, NSPCC)

- 4.1. Peter shared that the IWF and NSPCC had appeared on Crimewatch that week to discuss the IWF's latest research regarding children experiencing sextortion online. It revealed that victims are targeted an average of 8 times per year, with 91% of them being boys. He said there were many testimonies from Childline about the challenges they're currently facing. However, he drew attention to three significant points in the grooming space.
- 4.2. First, he highlighted the scale of the problem and the impact of end-to-end encryption (E2EE). There have been 34,000 offences in the last 5 years, with 1 in 4 victims being primary school children. Peter warned that Meta's rollout of E2EE would likely make the situation worse. He acknowledged that while tools exist to detect significant abuse against children, there is a dilemma between privacy and online safety. Similar to how E2EE is implemented for financial transactions, he said comparable safeguards should be expected for children's online interactions.
- 4.3. Second, the NSPCC is concerned that generative AI is becoming increasingly sophisticated, creating lifelike figures, including realistic depictions of children in abusive situations. He said the technology can lure individuals into relationships with strangers and that there is a direct correlation between AI and financial exploitation, as well as damaging influences on young people's health and well-being, such as promoting harmful body image issues like anorexia. Legislative measures such as the Online Safety Act (OSA) are in the statute book, necessitating robust guidance from regulatory bodies like the OFCOM. Next month, the Children's Code will be introduced, aiming to provide a comprehensive framework for protecting children online.
- 4.4. Finally, Peter said the voices and perspectives of children must be central in shaping regulatory frameworks to address their online safety. Without aligning regulatory responses with the realities faced by young people as digital consumers, there's a risk of underestimating the severity of the situation.
- 4.5. The Chair noted she had visited a primary school recently and reflected that teachers thought the change in behaviour since the pandemic was awful. Children were

consuming more violent content and using sexual language as a result of seeing violent pornographic content.

- 4.6. The Chair added to Peter's comments on E2EE. Facebook alone made over 21 million reports to NCMEC in 2022 and Instagram made an additional 5 million reports. She said a large majority of the 26 million reports originate from algorithms rather than user reporting. In Europe, due to an unintended consequence of new EU privacy laws, Meta stopped voluntarily scanning its platforms in the EU for 6 months. During this period, NCMEC saw a 58% reduction in EU reports. Law enforcement has also warned the rollout of E2EE would mean the alerts they receive about children at risk of sexual abuse on Facebook could fall by over 90%.
- 4.7. The Chair suggested drafting a letter to Meta from MPs and Peers with the statistics on E2EE highlighted by the IWF and NSPCC.
- 4.8. Kit Malthouse was dubious about this approach, noting his concern about the rising numbers of offenders. He noted that the APPG needed to persuade Government to flip its thinking and pursue a different approach. The current pursuit model for police is expensive and fails to make a significant difference. He noted that efforts need to focus on how to make CSAM difficult to find and stop the crime from becoming normalised.
- 4.9. He stated that Meta knows what content users are looking at because it's crucial for their advertising business model. He suggested that Meta should be independently audited, to circumnavigate the privacy vs safety balance.

5. Remarks from Frances Frost (Director of Policy and Advocacy Lucy Faithfull Foundation)

- 5.1. Frances said that the focus should be shifted away from burdening children and instead place the responsibility on offenders to refrain from committing offences. Since 2015, the LFF has conducted a deterrence campaign aimed at dissuading individuals from committing offences. This campaign has been extended to collaborate with technology companies to provide solutions, including deploying warnings when searching for illegal material. Recently, this collaboration has been further expanded through a partnership with the IWF to deploy a chatbot that interacts with users on warning pages when they search for illegal material.
- 5.2. Frances said that these efforts are effective. Last month, an evaluation of the chatbot was published, showing a reduction in searches for illegal material on platforms like Pornhub. The increase in traffic to online resources also indicates that the campaign, which has been running since 2015, is having an impact. However, despite these efforts, collaborations have only been established with a handful of entities. There is a desire to see more significant changes, with increased pressure from the government, consumers, and the public. She said that Ofcom has an important role to play in this regard.
- 5.3. Regarding grooming and illegal harms, Frances noted that the focus had been on settings in child accounts, with little emphasis on creating friction for perpetrators. As

Peter mentioned in his remarks about banking, there are frictional measures in place for data protection reasons and fraud prevention. She said similar friction should be applied in the context of protecting children online.

6. Remarks from Rhiannon Faye-Macdonald (Head of Advocacy, Marie Collins Foundation)

- 6.1. Rhiannon shared that she was a survivor of technology abuse. She emphasised that there is an incredible lack of understanding regarding the tactics of perpetrators, the immediate and lifelong impact on the child, and how to respond appropriately. She said it is disheartening to see all professionals, including teachers and police, blaming children for incidents simply because of images on their phones; she said this is not an acceptable response.
- 6.2. Rhiannon said that when we focus on E2EE we often fall into the trap of viewing it as a binary choice between privacy and safety, forgetting about the images that have already been shared. We don't know where these images have been circulated or who will see them, and the existence of a "report abuse" button is not sufficient to protect privacy. Meta's decision to roll out E2EE is a significant setback for victims, and it makes many, including myself, feel less safe. Other survivors have also spoken out about the negative impact of this decision, and it is truly disgraceful.
- 6.3. As a survivor, she said what disappoints her the most is that we have not effectively addressed child sexual abuse in various settings such as homes, schools, and religious institutions. We've had 30 years since the internet became prevalent, and while there have been some small steps forward, reports of abuse continue to rise. Now, we are facing the next catastrophe with the introduction of AI, deepfake technology, and virtual reality, all without proper safety measures in place. It's disappointing that we haven't learned from past lessons and that profit seems to take precedence over the safety of children, victims, and survivors.
- 6.4. She said that we need to apply pressure and ignite a sense of urgency in addressing these issues, advocating on behalf of everyone impacted by online abuse.
- 6.5. The Chair noted that Ofcom had agreed to attend the APPG's next meeting and compared the need to enact various protection measures for online safety to car accident prevention methods. The Online Safety Act was a step forward, but there is a need to think of other measures.
- 6.6. Adam Afriyie MP said that the Group should be bold ahead of the general election. He said no parties had fully formed ideas and would be willing to look at the Group's suggestions. He suggested that children should have no access.
- 6.7. The Chair thanked the speakers for the participation and suggested holding a backbench debate on child exploitation to raise the issues the Group had discussed at the roundtable.