

## Executive Summary of the White Paper

**Contact details:** Michael Tunks, Policy and Public Affairs Manager,  
[mike@iwf.org.uk](mailto:mike@iwf.org.uk), 01223 20 30 30

The IWF supports the ambitions laid out within the Online Harms White Paper and commends the Government for leading the way in publishing proposals for an online regulatory framework. We believe that the principles-based approach adopted by the White Paper is essential in ensuring that any legislation remains relevant due to the fast-paced nature of innovation and change in the digital sector. However, The White Paper still has some challenges to work through in providing clarity to the new regulator, industry and others so that the proposed new regulatory framework will not have unintended consequences.

The internet is, by nature, extremely difficult to regulate; its global nature, low costs to access, and vast amounts of content evade traditional models of policy making. Regulating the online space raises serious questions ranging from privacy and security to human rights and freedom of expression. As such, it is crucial that any regulator remains truly independent from Government, and any political interference.

### Building on Best Practice

The UK has some strong and effective mechanisms in place for protecting its users from online harms, and it is critical that successful models are not swept aside in the new regulatory environment. In 2018, only 0.04% of known child sexual abuse material was found to be hosted within the UK, and we have some of the fastest take down times in the world. The UK Government must build on existing legislation and regulation, utilising best practice and existing technical knowledge to deliver an effective approach that does not negatively impact the UK's vibrant digital economy.

The IWF is concerned with the impact that a regulator levy would have on the funding of current voluntary initiatives. The regulator must be careful not to prevent industry from funding impactful organisations. If industry cannot fund current voluntary initiatives, such as the IWF and our partners at the UK Safer Internet Centre (UKSIC), this could result in the removal of fewer child sexual abuse images, decreased levels of awareness amongst users, and increased pressure on law enforcement agencies.

The IWF has successfully operated within a very specific field for 23 years, and we could consider extending our remit to include grooming and live streaming, in consultation with our Members.

### Technical Expertise

As a partnership organisation, the IWF believes that collaboration is central to sustainable and impactful legislation. We urge the Government and the new Regulator to engage with industry and other relevant experts, such as the IWF, in a framework and codes of practice that are technically viable.

We would encourage the Government to build a shared forum in which industry members can disclose issues on their platforms and build solutions. The IWF provides a safe, secure and trusted forum for companies of all sizes and from different sectors to discuss issues with child sexual abuse material on their platforms, and we believe this is a crucial function which must be continued and further supported in the future. This would also be a strong arena for the regulator to engage with start-ups and provide high quality advice and support for building platforms that are safe by design.

We would encourage any company to engage with the IWF as early as possible and believe that the Government should mandate through the Code of Practice industry taking relevant IWF services.

## International Cooperation

Further thought needs to be given to how the Regulator will interact with companies based outside of the jurisdiction of the UK.

The new regulatory environment must work in tandem with existing legislation at a transnational level, such as the E-Commerce Directive and Child Sexual Abuse Directive. Furthermore, several of our Members have stated that it would be difficult to create technical solutions for just the UK regulatory environment, as their operation is based globally. The IWF believes the UK government should look to establish an international standard for categorising CSEA, possibly raised at the five-eyes ministerial forum and in discussion with the European Union. We are also concerned that the new regulatory framework may hamper the companies that deploy our services internationally and potentially our portal programme which provides a vitally needed place to report in the most under-developed countries in the world.

## Education and Prevention

The IWF is calling for a national prevent campaign to be launched aimed at 18 to 24 year old men, who our research has found to be the most likely group to stumble across child sexual abuse material on the open web and least likely to report it. We firmly believe that more should be done to prevent people from ever seeing indecent content in the first place.

In an increasingly digital world, users need to be empowered to keep themselves and their children safe online. We believe that there needs to be a better approach to sex and relationships education in schools and a more open dialogue with girls aged 11-13. Self-generated imagery now makes up one third of all the child sexual abuse content which we remove from the internet: 82% of which features 11-13 age range, and 99% of which is girls.

However, given the complexities of regulating the online environment, we believe that the Regulator would not have the capacity to focus appropriate time and energy into education and awareness. Rather, the IWF recommends that this should be kept in the remit of charities with a good understanding of engagement in schools and professionals, such as our partners at the UK Safer Internet Centre (UKSIC). Such organisations should be provided with support and funding from Government to deliver this crucial service.

## Scope

The IWF supports the Government's attempts to ensure that the Online Harms White Paper is a comprehensive document. However, we believe that it is not feasible to expect any regulator to have the capacity to address all 29 harms outlined in the White Paper. Rather, we recommend that the Government works with existing technical experts working in this field, such as the IWF, to address such a range of multi-faceted harms.

Additionally, we are concerned that the 29 harms in scope will demand significant resources, disproportionately affecting small companies and start-ups. We are concerned that this regulatory environment has been primarily designed for social media companies, and then later extended to encompass a much broader range of companies that make up the internet ecosystem.

We believe the Regulator must clarify both the harms in scope and its expectations, clearly setting out the responsibilities of industry. Further clarification is needed regarding the duty of care on industry, private communications, and how regulation will interact with existing legislation.

Ultimately, our wish is that the best thing is done for children who have been sexually abused, and then been further violated by having the images and videos of their abuse shared online. They are the priority and focus of our mission and protecting them should remain central in any new regulatory environment.