Your response

Please refer to the sub-questions or prompts in the annex of our call for evidence.

Question	Your response
Question 1: Please provide a description introducing your organisation, service or interest in Online Safety.	*Is this response confidential? – N* The South West Grid for Learning (SWGfL) SWGfL is a not for profit charity ensuring everyone can benefit from technology free from harm. Forming 1/3 of the UK Safer Internet Centre, our experts advise schools, public bodies and industry on appropriate actions to take in regards to safeguarding and advancing positive online safety policies. SWGfL has been at the forefront of online safety for the past two decades, delivering engaging presentations and training to a wide variety of audiences nationally and internationally. Our work has brought online safety to the forefront of public attention, ensuring everyone can develop their understanding of what online safety truly means in an ever-changing world. SWGfL operates four helpline services which are a rich data source on the plethora of issues children, young people and adults face online. The Professionals Online Safety Helpline, The Revenge Porn Helpline, Report Harmful Content and the Harmful Sexual Behaviour Support Service The Professionals Online Safety Helpline (POSH), running since 2011, supports members of the children's workforce across all 4 nations with online issues they are facing themselves or with the children they are supporting. The latest 2 annual reports show the nature of cases recorded over the last 2 years https://swgfl.org.uk/research/uk-safer-internet-helpline-annual-report-2020/ https://swgfl.org.uk/magazine/professionals-online-safety-helpline-release-annual-report-2021/ The Revenge Porn Helpline (RPH) has been operating since 2015 and was the first helpline launched worldwide to support adults who are experiencing intimate image abuse (colloquially known as revenge porn). The helpline has seen an unprecedented number of cases since the pandemic hit and this has not really subsided. The service currently operates in England, Wales and Scotland and their five year report and 2022 infographic show the nature of the cases seen since the helpline launched: https://revengepornhelpline.org.uk/resources/helpline-research-and-reports/ In 2021 SWGfL's RPH launched the first global platform in collaboration with Meta to prevent the non-consensual sharing of images, Stop NCII This service is available globally and works to hash images preventatively to stop them from being uploaded to any member platforms. Currently the participating partners are Facebook and Instagram, but other platforms are being onboarded and expected to be announced shortly.

Report Harmful Content (RHC) was publicly launched at the end of 2019 operating across all four UK nations as a platform to help members of the public report harm online. It provides people with advice and guidance on different types of harmful but legal online harm and how to report these on multiple different platforms. It also provides impartial dispute resolution relating to 8 specific harms

- Online Abuse
- Bullying or Harassment
- Threats
- Impersonation
- Unwanted Sexual Advances (Not Image Based)
- Violent Content
- Self-Harm or Suicide Content
- Pornographic Content

The following annual reports show the nature of cases seen since the helpline launched https://swgfl.org.uk/research/report-harmful-content-annual-report-2020/ https://swgfl.org.uk/research/through-these-walls-rhc-annual-report-2021/ The annual report for 2022 will be launched imminently and we will ensure this is shared with Ofcom.

The Harmful Sexual Behaviour Support Service launched in January 2022 in the wake of the June 2021 Ofsted review, concluding that the prevalence of child-on-child sexual harassment and abuse was so widespread that, for some, incidents are 'so commonplace that they see no point in reporting them' and 'consider them normal'.

SWGfL and The Marie Collins Foundation have created a support service for professionals working with children and young people in tackling harmful sexual behaviours both online and offline funded by the Home Office and in collaboration with the Department for Education. The service currently operates in England only.

In addition to our helpline services, SWGfL offers a plethora of other online safety resources and training. Our online safety review tool 360Safe has been actively used by over 14,000 schools throughout the UK. Part of our ongoing work involves delivering accessible information that is relevant and keeps up to date on the latest trends. Our Social Media Checklists offer guidance on how to actively manage the world's most popular apps whilst highlighting safety features and parental controls. These include Twitter, Facebook, TikTok, Snapchat, Instagram and Netflix.

Our digital education toolkit Project Evolve provides organisations with free resources, activities and teaching plans for a wealth of topics related to young people's online development.

In summary, SWGfL have applied significant resources over the last 10 years to the online safety field and as part of its contribution/ obligation to the UK Safer Internet Centre.

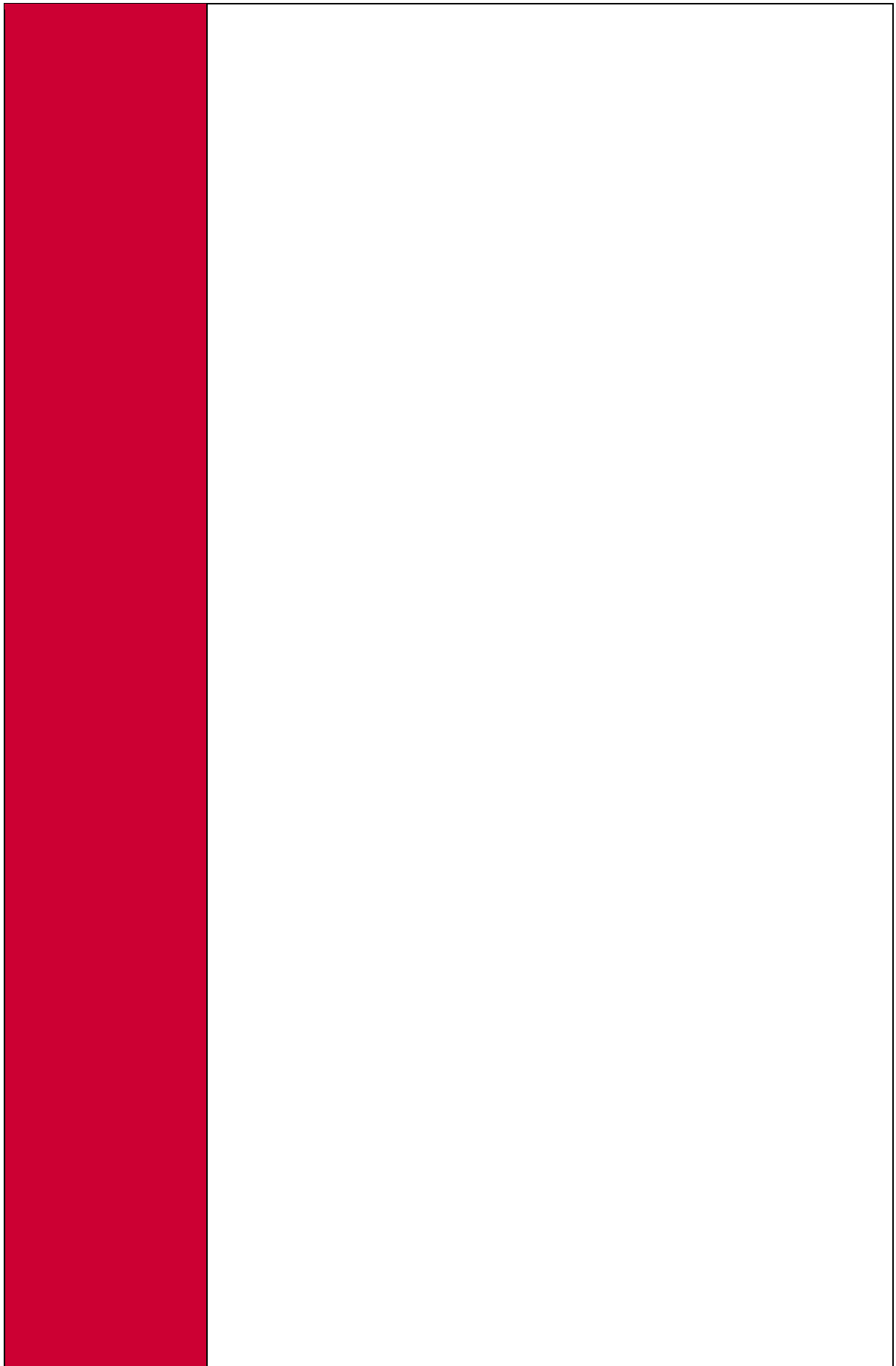|	
Question 2: Can you provide any evidence relating to the presence or quantity of illegal content on user-to-user and search services?	*Is this response confidential?* – <mark>Y</mark>

Question 3: How do you currently assess the risk of harm to individuals in the UK from illegal content presented by your service?	*N/A - providers question*
Question 4: What are your governance, accountability and decision-making structures for user and platform safety?	*N/A - providers question*
Question 5: What can providers of online services do to enhance the clarity and accessibility of terms of service and public policy statements?	*Is this response confidential? – N* As a society we have an insatiable appetite for 'free' services, with little thought as to why they are free. Personal data presents significant revenue generating opportunities for providers; however our experience suggests that most people, especially children, have little appreciation of the value of their personal data. The report 'Growing up Digital' (URL), published by the Children's Commissioner in England in January 2017, eloquently makes this point. The green paper details that "we will also encourage better communication between industry and consumers, including on guidelines and terms and conditions" (page 15). It is for this reason that we want to see something akin to food, laundry or eco performance labelling. Something that simply describes aspects of a site's terms and conditions and privacy statements in the same way that, for example food labelling indicates nutritional information. To supplement this, at SWGfL we propose to create the opportunity for users to rate and review terms and conditions, both sharing information and comments as well as raising further awareness of their importance. Good practice would also be to have terms and conditions that are accessible to all, (e.g., taking into consideration physical difference and neurodiversity, providing as audio/ video versions and easy read formats etc).

Question 6: How do your terms of service or public policy statements treat illegal content? How are these terms of service maintained and how much resource is dedicated to this?	*N/A - providers question*
Question 7: What can providers of online services do to enhance the transparency, accessibility, ease of use and users' awareness of their reporting and complaints mechanisms?	*Is this response confidential?* – Y

Question 8: If your service has *reporting or flagging* mechanisms in place for illegal content, or users who post illegal content, how are these processes designed and maintained?	*N/A - providers question*
Question 9: If your service has a *complaints* mechanism in place, how are these processes designed and maintained?	*N/A - providers question*
Question 10: What action does your service take in response to *reports* or *complaints*?	*Is this response confidential? – N* Although this a question for providers we would recommend that consistency across industry for reporting and complaints procedures would be helpful. Also, we would recommend clarifying the terminology used when discussing reports with government and industry. Ongoing conversations with DCMS have highlighted that the terms, report, complaint and appeal are often used interchangeably.

| Question 11: Could improvements be made to content moderation to deliver greater protection for users, without unduly restricting user activity? If so, what? | *Is this response confidential?* – <mark>Y</mark> |

Question 12: What automated moderation systems do you have in place around illegal content?	*N/A - providers question*
Question 13: How do you use human moderators to identify and assess illegal content?	*N/A - providers question*
Question 14: How are sanctions or restrictions around access (including to both the service and to particular content) applied by providers of online services?	*Is this response confidential? – Y*

Question 15: In what instances is illegal content removed from your service?	*N/A - providers question*
Question 16: Do you use other tools to reduce the visibility and impact of illegal content?	*N/A - providers question*
Question 17: What other sanctions or disincentives do you employ against users who post illegal content?	*N/A - providers question*
Question 18: Are there any functionalities or design features which evidence suggests can effectively prevent harm, and could or should be deployed more widely by industry?	*Is this response confidential? – N* SWGfL launched the first global platform in collaboration with Meta to prevent the non-consensual sharing of images, Stop NCII This service is available globally and works to hash images preventatively to stop them from being uploaded to any member platforms. We would recommend that providers in scope of the OSB become members to help prevent intimate imagery being shared without consent. As explained in our further We would like to see a better collaborative approach to tackling some of the wider issues and best practice/ open-source tech being shared within the community as a force for good. We would also encourage the continued move towards a safety by design approach utilising relationships with NGOs through trust and safety advisory groups to test and refine new features before public release. Similarly, in recent years we have seen more of a willingness by some platforms (e.g., Twitter and TikTok) to share data for research purposes in order to better understand what constitutes harm online and where there is scope to improve user safety. This would be a beneficial practice to adopt by all providers in scope to enable cross platform learning. As we know, it is only through collaboration that we can really tackle some of the underlying behavioural issues.
Question 19: To what extent does your service encompass functionalities or features designed to mitigate the risk or impact of harm	*N/A - providers question*

from illegal content?	
Question 20: How do you support the safety and wellbeing of your users as regards illegal content?	*N/A - providers question*
Question 21: How do you mitigate any risks posed by the design of algorithms that support the function of your service (e.g. search engines, or social and content recommender systems), with reference to illegal content specifically?	*N/A - providers question*
Question 22: What age assurance and age verification technologies are available to platforms, and what is the impact and cost of using them?	*Is this response confidential? – N* SWGfL are not best placed to comment on Age Verification technologies as this is not our core business. However, we contributed extensively to BBFC's consultations in their preparations for the introduction of the Digital Economies Act. Specifically, this contribution was offering predictions of the likely consequences of age checking. SWGfL's view has not changed in that age assurance and age verification are important tools but primarily to protect those younger children with mild curiosity or accidental exposure. SWGfL supports the risk-based approach to age assurance and age verification systems rather than focusing on size. Whilst, quite rightly, size of a platform is listed as a contributing factor, SWGfL has long had the concern that, merely applying age verification to the most popular services, will have the effect of driving users to other smaller platforms; those with less developed policies, fewer resources and capabilities.
Question 23: Can you identify factors which might indicate that a service is likely to attract child users?	*Is this response confidential? – Y / N (delete as appropriate)*

Question 24: Does your service use any age assurance or age verification tools or related technologies to verify or estimate the age of users?	*N/A - providers question*
Question 25: If it is not possible for children to access your service, or a part of it, how do you ensure this?	*N/A - providers question*
Question 26: What information do you have about the age of your users?	*N/A - providers question*
Question 27: For purposes of transparency, what type of information is useful/not useful? Why?	*Is this response confidential? – N* There will be circumstances where it is not appropriate or lawful to report on certain statistics or processes in the name of user safety. The last thing we would want to see would be for reports to facilitate perpetrator behaviour due to the amount of information garnered about a service. We are mindful that there is a balance to be struck here. Transparency reports containing large amounts of quantitative data, whilst helpful to an extent, become largely redundant where the contextual meaning behind these numbers isn't shared. Equally that the numbers themselves may inadvertently pitch platforms off against each other in a David vs Goliath type manner where the data is simply not comparable. For these reasons we would recommend containing an element of qualitative data in reports.
Question 28: Other than those in this document, are you aware of other measures available for mitigating risk and harm from illegal content?	*Is this response confidential? – Y / N (delete as appropriate)* No further comments

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