



Education Committee

Oral evidence: Screen Time: Impacts on education and wellbeing, HC 118

Tuesday 20 February 2024

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Watch the meeting

Members present: Mr Robin Walker (Chair); Anna Firth; Nick Fletcher; Vicky Ford; Andrew Lewer; Ian Mearns; Mohammad Yasin.

Questions 124 - 188

Witnesses

I: Deputy Chief Constable Ian Critchley, Lead on Child Protection, National Police Chiefs' Council; Jessica Edwards, Senior Policy Adviser on Childhood Harms, Barnardo's; and David Wright, Director, UK Safer Internet Centre and CEO, South West Grid for Learning.

II: Dame Rachel de Souza, The Children's Commissioner.



Examination of witnesses

Witnesses: Deputy Chief Constable Ian Critchley, Jessica Edwards, and David Wright.

Q124 **Chair:** Welcome to today's session, which is on screen time impacts on education and wellbeing. We are taking evidence from Ian Critchley, the Lead on Child Protection at the National Police Chiefs' Council, Jessica Edwards, Senior Policy Adviser on Childhood Harms at Barnardo's, and David Wright, Director of the UK Safer Internet Centre and Chief Executive of the South West Grid for Learning. Thank you very much for coming in.

To each of the panel, what is your assessment of the scale of online harms affecting children in the UK? Perhaps Jessica can start.

Jessica Edwards: Of course. At Barnardo's we work with children in our services. We are the UK's largest children's charity. One thing that does come up in our services repeatedly is the significant level of harm that children face online. This can range across content that harms children's mental health, their body image and access to pornographic content, which is one thing that we are particularly concerned about.

We also know that online harms can target children who are already the most vulnerable, including children with special educational needs and disabilities, experience of mental health problems, and children living in care and young carers.

We did a survey in 2022 of children and young people who we work with and the majority of the children who responded said that they had seen things online that had made them worried or scared.

Deputy Chief Constable Critchley: The most important voices have come from the courageous parents we have heard from recently, but from my professional viewpoint the scale of this is hugely significant. I talk about child sexual abuse, but clearly there are many online harms impacting a generation today, which is why I believe the Online Safety Act is arguably the most important Act that has been passed for generations.

A couple of statistics to assist: the Internet Watch Foundation in 2011 was dealing with 41,000 reports. This last year it dealt with 375,000. I reported recently in relation to all child sexual abuse that we are dealing with, which has increased by 400% since 2013. We are now dealing with 40,000 of the 105,000 crimes recognised and there is a significant amount of underreporting relating to online crimes.

It will always stay that adults pose the greatest risk to children and I can demonstrate that by our undercover online teams who, in the last year, arrested 1,400 offenders. If it were not for them, the offenders would seek to prey on young people, seek to groom and exploit them, meet them and commit the most appalling offences, and that resulted in 1,200 years in custody.



It is important to stress that of the crimes reported 52% were committed by other young people. That is a significant statistic influenced significantly by the online environment in which young people are now living and the ease of access to violent pornography. We see it very much as a gender-based crime in relation to boys committing offences against girls, and these range from those of the highest harm, which were called out in the Everyone's Invited campaign two or three years ago, right through to behaviour that has become normalised between young people: the sharing of indecent images between young people, consenting images, criminal offences committed. I do not want to criminalise a whole generation of young people, so the area of prevention is important, but that, of course, means from a policing perspective it is important for me to identify where the greatest harm is as to where we can prevent and impact upon harmful sexual behaviour as well. Hopefully, that gives you the context of some of what we are dealing with, along with what Jess has described as lots of other harmful behaviour, whether that is around gambling, suicide, depression and many other areas.

Q125 Chair: Thank you. To follow up on one point on that, you mentioned the 52% figure for the number of those crimes perpetrated by younger people. I presume the number of criminal justice outcomes for that proportion is significantly lower. You talked about jail time for the adults involved. It is a difficult balance, how to protect people from being inadvertently criminalised and how to ensure that those most serious crimes are punished. Do you have any figures for the number of people who do engage with the criminal justice system due to underage crime?

Deputy Chief Constable Critchley: In relation to all crimes, which does not necessarily answer your question, we are bringing around 11% or 12% of offenders to justice for the totality. We have given out guidance recently and it is more work that we are doing with the Vulnerability Knowledge and Practice Programme and deep analysis based on our findings this year, where we need to do exactly what you have described there in relation to guidance to all forces where it is non-aggravated, self-generated indecent images and that in no way should we at all attach blame to victims in these areas. Where there is non-aggravated sharing of images we are not seeking at all the criminal justice route. We are seeking to work with safeguarding partners, schools and education to ensure that that young person is safe, and it has already given that guidance and is working with the crime registrar.

Conversely, we need to ensure that harmful behaviour peer on peer follows through a criminal justice route. Finding that balance is very important for us in the training we give to our staff.

Q126 Ian Mearns: Briefly on that one, in terms of the 52% of crimes and harms committed by young people, has there been any work done in terms of research or analysis to look at the 52% themselves, the ones who are the perpetrators, to see if they have previously been subject to online harms from other young people or adults?



Deputy Chief Constable Critchley: Not in the depth that you describe. We seek to see the report that comes to us through the lens of that child. We will seek to understand the background of that child, what the motivation is, what the offence is that has been perpetrated here. While I technically term it an offence, sharing of an indecent image from one child to another is a criminal offence, but of course if it does not have the background behind it, then we do not want to criminalise that young person. Of course, if there is previous offending behaviour, if there are precursors to that, the public would expect us to follow the route that is most appropriate for the offences committed.

Q127 **Chair:** Thank you. David, apologies for keeping you waiting.

David Wright: I am from the charity SWGfL. We are one third of three charities in the UK Safer Internet Centre, and we have been since 2011. We are one of 32 European Safer Internet Centres. We operate three helplines and since 2011 we have supported the children's workforce around online safety-related issues, the national platform for anyone over the age of 13 experiencing legal but harmful content, and then since 2015 we supported adults who are victims of non-consensual intimate image abuse through the revenge porn helpline. That is where we have seen the biggest growth. We have seen a tenfold increase in cases in the last four years and there is a particular point I would like to make about that, but granted that is to do with adults.

Through feedback from the helplines and particularly the work that we have done with schools for over 20 years, I will pick up a point that both Jess and Ian have made about harmful sexual behaviour. In 2022 we operated a pilot support service for schools in England about supporting below threshold referrals about harmful sexual behaviour in light of both Everyone's Invited and the Ofsted review of sexual abuse in schools and colleges, which clearly found harmful sexual behaviour to be endemic, commonplace and normal. There is a lot of work to do with that and connected with non-consensual image abuse or sharing, whether that is children or adults. It is, in my experience, increasing.

Equally, vulnerability. Long has it been said that those most at risk online are those at most risk offline. There are a number of pieces of work to do with standards around schools and protecting children and some of the new standards that were launched by DfE last March. We are releasing an accreditation for filtering systems in schools that has been built. It goes back some nine years in preparation and ironically today that has been released.

Q128 **Chair:** You mentioned that tenfold, which is a very striking increase in revenge porn in four years. Ian Critchley has given us a number of statistics of very concerning rises. Is there a specific online harm that you feel is the most significant or the most prevalent? I appreciate there are many varieties and part of it is to do with the vulnerability of the individuals, which we will come on to. Jessica, from your perspective is there one area that you want to highlight or one statistic you want to draw the



Committee's attention to in that respect?

Jessica Edwards: Our big concern is around the ease of access to pornographic content online. At the moment there are no blockers in place to stop children from seeing pornographic content, both on pornography sites and on social media sites. We are, of course, very happy that the Online Safety Act will introduce age verification on both these sites of pornographic content, but at the moment that has not been implemented.

We know that children are coming across pornography from as young as seven. When we talk about pornography we need to remember that a lot of this is violent and abusive. It is not the top shelf magazine content. It is very abusive, particularly towards women and girls.

Research from the Children's Commissioner found that 79% of children had encountered violent pornography before the age of 18, so it is a massive epidemic. We are also concerned about sexualised content that can be presented to children and young people on social media, so algorithms can push this content to them. We are not necessarily talking about pornographic content here, but it is the content that can normalise the bar for pornographic content and lead children to that content on other sites.

Q129 **Chair:** Does this create concerns about body image?

Jessica Edwards: Completely. When we talk about pornography, obviously there is the impact on normalising sexualised behaviours, but there are also concerns around damage to children's mental health, to their perceptions of body image. It does carry a lot of harms with it.

Deputy Chief Constable Critchley: In relation to child sexual abuse, it is getting younger. The Internet Watch Foundation found a 60% increase in self-generated images came from seven to 10-year-olds. It comes from the increased prevalence of young people having access to smartphones, being able to access sites, as Jess describes, without any appropriate age verification. Then the sharing of an image, which can be non-aggravated as I have described between consenting parties, but even then that image is lost to that person. It might be somebody they are consenting with at that time, but that is lost and it is on the internet and it can cause so much harm to that young person.

In addition, we are seeing a growing prevalence of what we call sextortion, or financial extortion from somebody. That young person is somebody who they are seeking a relationship with, but is sitting somewhere else in the world, and the harm that is being caused. We saw a recent case in Canada of a 16-year-old who took their life in relation to it, and the harm and the embarrassment. We have a significant underreporting in relation to that area and this is not just about young people. It also impacts on adults, as David describes. Harm is caused, and there is a direct link from child sexual abuse to, as Jess describes, the impact of anxiety and harm on the internet, whether that is associated with what we have described there but also in relation to the algorithmic nature of the online material.



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From a professional and personal perspective, I can describe the ease with which somebody can be taken very quickly down a hole in which there is no age verification, no protections and see some of the worst harm, which is impacting on their mental health and on their behaviour.

David Wright: I could not agree more. Certainly, for us, tech-facilitated gender-based violence, particularly violence against women and girls, is exactly the thing that we see, the helpline sees all the time, and the sharing, whether it is children or adults. It is the sharing of intimate imagery content without any form of consent. That is exactly where we see the threat, but I am not taking away from that there is clearly a variety of content conduct and contract-related issues. It is very broad.

Q130 **Vicky Ford:** On the violent pornography, I agree and I am one of the Members who pushed the Government to say that needs to be outlawed, that you need age verification of online pornography, on social media sites as well as websites, in the Online Safety Act. My understanding is that the draft guidance on that came out in December but has still not been implemented. Jessica, do you think that organisations such as Barnardo's could be doing more to explain to young people that this is on its way, that we have changed the law, that this is coming through, and help them to call it out now? Do you think we could do more to help young people's voices get heard in getting that guidance right?

Jessica Edwards: Completely. Listening to children and young people in this area across all online safety harms is key. They are the experts in what they experience online and the harms presented to them. With regard to education, absolutely. The blocking of pornographic content from being seen by children is one thing, but educating children around what pornographic content depicts, how it is not depictions of real sex and real relationships, and helping them to understand that and understand the content that is illegal is important. I do think we need to be careful that the onus cannot just be put on children to protect themselves. It needs to be ultimately on the tech companies.

Q131 **Vicky Ford:** That is what the law does. We need to tell the children that the law is there to help them.

Jessica Edwards: Exactly, and once the legislation is in place those blockers will be there, so children will not be able to access pornographic content. That is definitely important through education.

Q132 **Chair:** I guess the proof of that is in the working. Are there other jurisdictions that we can point to where those blockers are working effectively without people finding ways around them?

Jessica Edwards: That is one of the big challenges. There have been several jurisdictions that introduced different age verification measures for pornography while the Online Safety Bill was going through Parliament here. France was one. There are also several states in the US that introduced this, and Australia. A lot of them are still very much in their early days. One thing that did happen in France, which shows how robust



we need to be with the guidance, was that the pornography companies did a judicial review in France around the age verification mechanisms, citing that they were unclear. It is key that the Ofcom guidance that is out for consultation at the moment, which we and many other charities are responding to, is very clear in what is expected so that we do not have that same legal challenge when it is implemented.

David Wright: Particularly on the point about technical abilities or technical filtering parental control mechanisms, I am sure we are all familiar with the point about end-to-end encryption. The direction of travel that we have from a technical perspective is all about encryption and about privacy, which everybody I am sure would like more of, but one of the byproducts of that is it is going to be increasingly harder for these filtering mechanisms to work. For example, again I come back to the accreditation mechanism scheme that we launched today for school filtering-based systems. One of the things that we discovered only a couple of years ago is that with many filtering systems that are in use in UK schools you can disable filters for illegal content; so the Internet Watch Foundation URL-based list, in some systems active in schools somebody can turn those filters off. The administrators can turn those filters off, so in our experience the threat to children in schools lies with those adults.

That is one of the things that we do not see should play a part in any filtering system that is in action in a school today. It should not be possible to disable it. Who in a school is going to need to access illegal content? As an example to try to raise standards, if you transpose that into the home situation, like I say, the direction of travel is going to make it significantly harder for parental control systems to be effective.

Deputy Chief Constable Critchley: I welcome the ongoing pornography review. It is so important in terms of the correlation that we have now seen to the ease of access of pornography that is violent and, therefore, impacting norms and behaviour, largely gender-based norms of violence from boys and men to girls. We saw that. We saw in the follow-up to the Everyone's Invited campaign that 90% of girls had received unsolicited, indecent images sent to them by boys. On the age verification issue, the framework is good and clear in the Online Safety Act. The key is in the implementation around it and moving from a position now where there is no age verification to one that is robust.

There should be no conflict with privacy and that is often the argument in this regard. There should be no conflict. Nobody wants to conflict with the privacy particularly of young people, but we must make sure about the age inappropriate content that is so damaging and causing so much harm.

Q133 **Ian Mearns:** An awful lot of this has been alluded to, but is there anything that you would like to add specifically in terms of how interacting with online harms can affect children and young people?

Jessica Edwards: When speaking about pornography, there have been links to harmful sexual behaviour. One thing that is important to



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understand is that pornography can exacerbate issues that children already face, whether they have faced abuse themselves or have been subject to other online harms, whether they have different mental health issues. Accessing pornography can then exacerbate how they feel about sex and relationships and the sometimes abusive acts that they can then conduct. That is key and research by the Children's Commissioner for England found that in associated interview transcripts between child-on-child sexual abuse, in 50% of cases they included words referring to at least one specific act that is commonly seen in pornography, so there is some evidence emerging of those links.

We also know that online pornographic content is violent and often completely perpetuates gender-based stereotypes and is racist. We are also concerned and we have spoken a lot about the age verification for pornographic content, but also to ensure that the pornographic content is regulated online the same way it is offline. This is something that Barnardo's and other charities pushed for during the passage of the Online Safety Act and are continuing to push with the review on pornography.

Offline a lot of pornographic content—for example, content that does show overt sexual violence—sexualises children, so barely legal pornography, which is adult actors pretending to be children, would all be prohibited by the BBFC offline but that regulation has just never been extended to online pornographic content. As a result this content is out there and is damaging children but also adults' views of women and of children, sexualising them.

We are also concerned about issues of body image. We know that one in six children in the UK have a probable diagnosable mental health disorder, and online harms are only exacerbating that. We are concerned about content that promotes self-harm and suicide. We know that 26% of children and young people who presented at hospital with self-harm or suicide attempt injuries had access to related content online, so there is a link there.

David Wright: There is this point again about vulnerability. Long has it been said and a lot of research has concluded that those at most risk online are those at most risk offline, and we have seen too many tragic cases where that is so true—Frankie Thomas, for example—which I think has been part of the catalyst for some of the changes that DfE has introduced around some of the standards. Vulnerability affects children clearly in different ways and we have too many examples of where that has resulted in tragedy.

Deputy Chief Constable Critchley: What we have seen with the interaction of the online harms is a significant increase clearly in the number of victims and of offenders who are young people. This is lifelong harm. This is not something that comes and goes. This has lifelong consequences. We all have responsibility—parents, carers, schools and the role of online platforms themselves, the sellers of the devices—to make it easier for parents. Everybody has a responsibility to reduce the number of



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victims and to reduce the number of offenders impacted by online harms and the lifelong trauma. We see the impact physically and mentally in sometimes the most tragic of cases.

We have talked about the normalisation of behaviour particularly around boys and a generation of boys who are impacted in terms of violence towards girls, but others who are more vulnerable, particularly those with vulnerable characteristics who suffer the bullying, violence and harassment online. This has all been created by online platforms. It is all preventable and that is the space we must get to, because if we are just responding to it all the time the harm has already happened. We have a responsibility as law enforcement. We work very closely with the NCA global law enforcement, the Virtual Global Taskforce, to make as big a dent in those who have committed the highest harm, but the scale of this is astronomical at this moment in time. To understand the harm and to make sure that we are able to safeguard and protect children, it must start at prevention.

Q134 **Ian Mearns:** Is there anything that you want to add about social media, about communication networks and about messaging in terms of the potential online harms?

Deputy Chief Constable Critchley: There are a couple of areas. First, in relation to the use of those platforms for both sharing of images and the grooming and exploitation on social media, offenders, adult offenders predominantly purporting to be young people, eliciting images, eliciting finance, seeking to meet up to commit abuse on these platforms. There is technology available to identify and prevent this. There is technology available to prevent images being shared at upload. That is where it needs to start, at upload, rather than once it is online.

I am deeply concerned about end-to-end encryption around that. I think it abrogates responsibility of companies. Companies are making billions of pounds of profit and are abrogating their responsibilities to keep children safe. Bringing in end-to-end encryption will abrogate responsibility by being able to say, "We cannot see it; therefore, how can we report it?" That is an outrageous position and Meta's position in relation to that is appalling and the risks that that creates for young people in relation to having a platform that they are using and not being able to regulate the significant harm caused on there.

David Wright: Can I pick up on a point that Ian Critchley makes there about the tools that are available? Back in December 2021 we created, in partnership with several tech platforms, something called StopNCII.org, so Stop Non-consensual Intimate Image abuse, a platform where if you are threatened with having your images posted online, for whatever reason, you can visit the website to create a hash, a digital fingerprint of your image, yourself, on your device, so you do not share the image or it stays on your device. It is the identifier. The hash code then gets added on to a databank and then instantaneously is shared with platforms, so currently Facebook, Instagram, TikTok, Bumble, Reddit, OnlyFans, Pornhub, Snapchat, to prevent anybody else anywhere in the world from uploading



that image to their platforms. StopNCII is for adults, so last year we gave the technology to NCMEC and it created Take it Down, which is the same thing for children. There are tools available that can help you at that particular point and it is all about awareness.

This is quite a courageous thing for platforms to do because the images are unverified. It could be any image that you could hash yourself and then upload, so we need to be very targeted. This is the role for social media, that when they know, if they identify people or search engines identify people who are in that situation, experiencing that threat, experiencing that distress, that is the moment that you need those tools and at that precise moment to do something instantly. There are things available. Report Remove as well is available in the UK from the NSPCC.

Q135 **Nick Fletcher:** Can you explain that to me again? If somebody sends you an image of you, because that is what they are going to do, they are going to bribe you, is that what you are saying? They send an image of you and then you hashtag it and then you put it to these platforms.

David Wright: If you are being threatened to have your intimate image posted online. Perhaps you shared it during a relationship. We typically find there are two instances. If you have been in a relationship we typically find this targets women, so the male will then threaten to post your image out of revenge, revenge porn, or through extortion. If you are being extorted, you have shared that image and now you are being extorted usually for money, it is at that moment that the threat is to post it online to create distress.

Q136 **Nick Fletcher:** You must be sent that image?

David Wright: You have usually shared it in the first place.

Q137 **Nick Fletcher:** If someone has just taken a photo of you and you do not have that image, you cannot do anything about it, can you?

David Wright: No.

Q138 **Nick Fletcher:** If they share it with you and say, "This is the image I'm going to put on unless you do this" then you would be able to do that?

David Wright: Yes. However, usually you will have shared that image in the first place.

Nick Fletcher: This is the first I have heard of this.

Chair: Yes, it is interesting. We have never come across that technology.

Nick Fletcher: I think it is a great technology. Do not share images in the first place or take them, but if you have, then that is a good thing.

David Wright: There is a lot of pride in that.

Q139 **Anna Firth:** I am pleased to hear that you regard the Online Safety Act as being a world-leading piece of legislation, which I was proud to support. I am pleased you think within that the age verification systems should work,



but we understand that that Act is not going to be operational for at least 18 months, possibly a bit longer. From what you have said today, in those 18 months and given the rate of increase of these terrible harms being promulgated, hundreds of thousands of young people could be damaged. I want to pose a very simple question. In this next 18-month period what are the simplest things that parents, schools, carers and communities could do to keep those children safe? I do not care how basic they are or how mother and apple pie they may be. We need to get the message out there. What can be done by schools, parents and carers in particular to safeguard children?

Jessica Edwards: I am happy to kick that off. I think education and awareness raising is key. We do know that a lot of the tech platforms have parental tools that can be used, but they are not that well used in terms of protecting children from different content, limiting their screen time, for example, and raising awareness about those parental tools is key to help parents regulate what their children see online.

Q140 **Anna Firth:** Jessica, who do you think should raise awareness of those tools?

Jessica Edwards: That responsibility should be on charities such as Barnardo's to do more of that work, but also on tech companies who have that responsibility for the harmful content that is on their platform, and on the Government to continue to raise awareness on this issue and to help signpost parents to these tools. There is also a role that schools can play in that signposting and on educating children through RSHE lessons around the harms of social media and what children can do to protect themselves. What we would like to see happen in the interim is tech companies taking more responsibility for the content that is on their platforms and starting to move in the direction of the Act and to do things such as implement age verification. The Online Safety Act might not be implemented yet, but that does not stop tech companies from starting to put in place some protections.

Q141 **Anna Firth:** I agree with that. It seems to me from what I have heard so far that schools can make those places safe by using the filters to turn off the central system so children cannot access harmful content, and by having a strong mobile phone screen policy so that the children do not interact with harmful things during the school day. What about outside the school day? We have heard evidence from parents on Safer Internet Day that videos, hard-hitting videos, are the most powerful way to raise awareness of the harm, but that video would need to tell them in very simple terms how to keep the children safe. What about a public health campaign in which parents are told to make sure their internet is switched off or switched off for anything harmful at 10 pm, some internet watershed hour such as we have on the TV at 9 pm, or make sure your child does not have any screen in their bedroom so that the nighttime is a safe place for children? Would that be sensible?



Jessica Edwards: With tools that parents can use, and any awareness raising on that, the one issue is not all children do have parents or the family situations that others do. If we are thinking about children in care, for example, how do we ensure that those children who we know are very vulnerable to online harms are protected?

Q142 **Anna Firth:** A very good point, but surely somebody manages the care home. They could switch off the internet. I am talking in extremis here. I am sure there are very good tools that you could use to make sure that the internet is safe, but the person who is managing the home could do that. Could they not also ensure that those children in that home do not have screens in their bedrooms at night?

Jessica Edwards: That is definitely one step. We do also need to think about children, for example young carers, who do not have that traditional family upbringing. That is the concern we have, for those children who are the most vulnerable, who do access this content and often spend more time online and are more at risk of seeing harmful content. How do we protect them? The ultimate thing is to remove the harmful content from the tech platforms and that is where the responsibility lies.

Q143 **Anna Firth:** I totally agree with you, which is why I am looking at that 18-month period before the Online Safety Act comes into effect.

Deputy Chief Constable Critchley: That is an important point, because in those 18 months, of course, technology will change very quickly. We talk about AI as if it is something in the future. It is here now. We have seen the nudification from celebrities through to school children. We have seen a growing metaverse where we know there is harm being caused. You can go on app stores and get chatbots that will direct you into harmful behaviours, which will encourage you to commit suicide or commit sexual offences. You can get those quite easily downloaded from the app stores, so 18 months is a long time in terms of the harm.

I am reminded about Professor Jay after the IICSA seven-year inquiry where we heard from many courageous victims that child sexual abuse is not something in the past. The explosion in online-facilitated child sexual abuse underlines the extent to which this is endemic in England and Wales.

In terms of the Act I do think there are things that can be done now. The legislation has already been brought in on cyberflashing and the facilitation or encouragement of someone to self-harm or commit suicide, and we welcome the consultation that is going on in relation to the codes. I do think Ofcom now has the power to be able to lean into those companies and not wait while the codes are being developed, to influence behaviour and to ask the relevant questions around age verification, around uploads already while those codes are being developed. I want to see that and the influence, but your point is that we all have a responsibility. Offenders ultimately have the most responsibility here and the Lucy Faithfull Foundation and others do some fantastic work in relation to deterrence campaigns.



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The companies have the greatest responsibility here. I saw the phrase recently is the genie out of the bottle to be able to get to a position that you describe of preventing children having access to the phones? Well, the key bit is preventing them having access to online harms, because there is, I think we should all acknowledge, some great things that allow people to connect. There are some great things that this brings, but there are some extremely harmful ones and it is those that need to be prevented. It is those that the companies should prevent. Even at point of sale how difficult is it for us as parents to get home with a new device and put software on or put security devices on? It should be done at point of sale. It should be much easier for parents and young people to ensure that they are safe at point of sale.

Q144 **Anna Firth:** Should they be sold with a default setting so that the phone or device is as safe as it can be and you must disable those safety settings rather than put the safety settings on? Secondly, my point is about digital hygiene and parents, schools and carers all having that responsibility. Should we think about a digital sunset so that these screens, phones, are outside of bedrooms at night?

Deputy Chief Constable Critchley: At the moment it is the individual action of parents and carers beyond what the companies are doing. Would that be the ideal? Will we ever get to that point? What we are saying is that we need to remove the ability for children. One way of doing that is clearly in restricting devices. Having brought up three children myself I certainly know the impact, the peer pressure that there is in terms of maintaining contact with friends, whether they are in the room physically or virtually. The most important thing is to make sure that we have the conversation. If the conversation is after the harm has already taken place it is too late. We need to revise the education that takes place. Is it current to the needs of our children? We need to revise completely education within schools and the education of parents. We have done it in schools as you describe. That will have some impact but there are many hours outside that school window. The biggest impact for me is removing that online content, which is clearly what the Act prevents, to allow children to always use devices in a safe way.

Q145 **Anna Firth:** Of course, but we still have this 18-month period. Do the disadvantages of a child having a phone between the hours of 10.00 pm and 6.00 am outweigh the advantages of a child having a phone between those hours?

Deputy Chief Constable Critchley: From a professional point of view there is clearly a societal discussion to be had. From a professional point of view there are offences being committed during those times that we need to prevent. Clearly, there is a societal discussion around the access to phones for all young people. It has taken place on the back of very courageous parents that have stood up because of the greatest harm that has been committed to their young people. That has led to an enhanced debate over the last few weeks around schools and access to schools. We welcome the work of the Committee in relation to the societal position on



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the availability at schools. The greatest bit for me is the device and the content should be safe, wherever that is used and whatever time of day that is used.

David Wright: There are several things here. It casts me back to the UK Chief Medical Officers in 2019 who launched a campaign exactly about that. They concluded four things. There is insufficient research; there should be screen-free mealtimes, or families should have screen-free mealtimes; there should be no screens an hour before bedtime and no screens in bedrooms overnight; and something about turning devices on. Back in 2010 the Bailey review concluded and made a recommendation about “active choice”, that when you install a new internet service provider as a parent you should make an active choice. Rather than it being on by default or off by default, there was a huge debate at the time that parents must decide whether they want it on or off. That should be in place today. We have some of those components.

There are clearly a variety of tools. There are a variety of safeguards that are available. I do equally fear that parents do not use them and that parents totally rely on them. I worry that if we have all these parental controls on, and that is my sum total, that that lulls you into a false sense of security.

We mentioned Safer Internet Day, which was 6 February, and it was here that we had young people, which was wonderful. One of the conclusions in the five-point plan was around the research that we published on the day, that only 32% of children recognised the Online Safety Act and 42% of parents. We have a job to do. Part of the five-point plan, perhaps known now as Vicky’s five-point plan, is working with schools to make information easily accessible about what the Online Safety Act is, a school pack, for exactly that sort of thing, to articulate what it means for children, for parents, indeed for us all.

There is a point about clear, simple online safety information provided by telecoms providers and device manufacturers. One thing that we liked that we hope to implement is an unboxing that was done in New Zealand, so that when you have hand-me-down phones, because you clearly have a contract by perhaps the parent and then the phone gets handed down, the same thing is lost. Creating some form of box that parents can give this second-hand device to their children that includes vital information about that, perhaps reset information and enabling some controls in there so you try to create that secondary opportunity, I think that is a good one.

Working with the DfE, part of keeping children safe in education, and with the Welsh Government and the Scottish Government, about statutory safeguarding obligations and classes for parents to be considered in there. Children’s experiences should be age appropriate, so Ofcom considering age-gating content, which we have already talked about. The final one is around giving children a voice in all these conversations, their perspective



and their contribution into all this. Those are five things that certainly came out of that.

Anna Firth: Would you support advice—

Chair: We need to move the session on, I am afraid, because we are going to run out of time for the Children's Commissioner if we proceed at the current pace. I will bring in Nick.

Q146 **Nick Fletcher:** I would love to continue this conversation. I think it is so important. I understand where you are coming from, Ian, but I do think there is a disciplinary element at home that is difficult to enforce. I have brought up children myself and I used to love being able to switch the wi-fi hub off, but now they have unlimited 5G or whatever it is, so it just becomes really difficult.

I want to get back to prosecutions on this. How easy is it for the police to prosecute perpetrators of crimes that are affecting children? This is for Ian Critchley.

Deputy Chief Constable Critchley: There are two elements. One is the legislative element and the other is the process and what we are now dealing with to secure the evidence to prosecute these crimes. There is some additional legislation that has been brought in already in relation to the Online Safety Act. We would like to see further legislation, particularly in relation to moderators and administrators of sites that host child sexual abuse material. We would like to see, for example, childlike sex dolls becoming illegal. For me it is nonsensical in terms of the legislation.

Nick Fletcher: Can you just repeat that?

Deputy Chief Constable Critchley: The childlike sex abuse dolls. It is already illegal to sell or import them, but there is a loophole in relation to possession. Again, these are areas that we should move forward on. AI tools, so artificial intelligence, again I think we need to get ahead of this very quickly. We are already seeing a huge increase in AI-generated child abuse material and the ease with which tools are now accessible to create that material.

There is something in relation to the legislation fitting the context of what we are now dealing with. In terms of the process, the police have invested heavily in resource. We have increased significantly the resources required now in our online child abuse investigation teams working with our regional organised crime units and the National Crime Agency. That is through the Virtual Global Taskforce, because this is a global issue.

The scale of what a Commodore 64 used to hold against now the number of terabytes that a device holds, to be able to examine that device, to be able to obtain the evidence, takes a significant amount of time and investment in technology to be able to provide the evidence for court. We are working with the College of Policing in relation to the training that is required. We can, of course, train our specialists, but when we talk about



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young people to young people often that is being dealt with by our new staff, new colleagues. We are working with the College of Policing in professionalising a public protection programme.

With the Crown Prosecution Service and the courts now in terms of the speed and the timeliness of which these cases are going through the courts, the pandemic enhanced the backlog in which cases are going through. That causes me real concern, particularly when a child victim is involved, so we are working very closely with the Crown Prosecution Service in relation to the level and scale of evidence required.

There is a debate to be had around sentencing. It does not feel long ago since the possession of indecent images of children received a custodial sentence. Now that would be exceedingly rare where possession receives a custodial sentence. Often it would be non-custodial or suspended. I have talked about some of the figures and you can imagine the consequence in the judicial system around it, but that has probably exacerbated the normalisation of what we are dealing with. It should never be normal. The indecent image of a child should never be seen as normal, but it has become normalised. The sharing of indecent images has become normalised and there is a debate to be had around the sentencing as well.

Q147 Nick Fletcher: Very quickly, do you think you will be able to use AI to your advantage to go through these devices so that it can pick up those images for you and save many hours of police time?

Deputy Chief Constable Critchley: Absolutely. There is an AI for good as well as one for bad. We are already working with tech companies to innovate, through our world-leading child abuse image database, to ensure that it maintains and continues to be world leading, to make sure again that we do not fill that child abuse image database with generated images, which would stop us identifying the real victims, but use technology to ensure that we are better able to identify offenders and identify and safeguard the victims.

We work across a four P approach here in relation to making sure we are pursuing offenders wherever they are in the globe. There are brilliant people working in this area who see some of the worst acts that one human can commit against a child, but our efforts have to be equally, if not more, focused on prevention. I work with some fantastic charities here. We have talked already about the role of schools, parents and carers and the most significant role of the tech companies in keeping the online community and our children and young people safe.

Q148 Nick Fletcher: I need to move swiftly on because I am conscious of time. We have heard evidence to suggest that certain vulnerable groups of children are more likely to be affected by online harms than others. Does this resonate with your experience? How could regulators best tailor their approach to protect vulnerable groups from online harm? I will come to Jessica for that.



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Jessica Edwards: Research by Barnardo's has found that children in care, care leavers, young carers, those experiencing poverty and children with additional needs are more susceptible to online harms. As David Wright was saying, it is very much children who are already vulnerable offline where the vulnerabilities continue online.

Barnardo's practitioners have said that they can be more susceptible because of increased use in comparison to other children, because of their decreased ability to approach and interact with social media in a self-protective manner. These children are also more likely to experience isolation from family and friends, or struggle to develop and maintain offline relationships due to moving around, being unsettled in how they live. What we do know is that all children from all backgrounds are at risk of accessing harmful content on platforms, so fundamentally the issue is to get rid of that harmful content on these platforms.

As I have already said, there is also a real importance to tech companies developing parental tools or tools that children can use themselves to protect themselves from this content. We just do not think this is far enough. There needs to be less onus on parents or children and tackling the root of the problem, ensuring safety by design on tech platforms and in removing this content.

Q149 **Nick Fletcher:** I think one thing that we need to admit to is that unfortunately the people who we are trying to protect probably know more about these devices than we do as parents and it is difficult. We need to admit that and work forwards, but it is back to the tech companies again and the offenders. David, do you want to add anything?

David Wright: This is more a belief. Years ago I saw data from Facebook that it could accurately predict 100 days before you are going to have a relationship with somebody that you are going to have a relationship with them, based on sentiment, based on frequency, extraordinary data. I firmly believe that if we can predict that, we should be able to predict when harm is going to happen. We have well-trodden research that we have heard about, well-trodden and well-understood indicators about what harm does. Social media will understand some of these metrics and should, if you apply the same algorithmic approach to it, be able to identify and potentially prevent harm from happening in the very first place, whether that is through nudges or some form of indication, or then presenting different information to them.

Chair: Thank you, Nick. I will bring in Anna again on the tech companies.

Q150 **Anna Firth:** I think we have covered a lot of this already, but in case there is anything additional that you want to say, to what extent are social media and tech companies to blame for children accessing online harms on their platforms? We will start with Ian Critchley.

Deputy Chief Constable Critchley: I would always say the ultimate responsibility lies with an offender in this regard, but I must stress that, for me, the companies that create wealth and who have created these



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communities are the ones that have the greatest responsibility to keep children and young people safe. It should not have needed an Act for leaders to step forward to put child safety at the heart of their companies.

Unfortunately, what I see too much is reaction to something, reaction to crisis, reaction to a very sad death. We have seen that reaction to the Senate inquiry rather than leaders stepping forward, taking responsibility and putting child safety right at the heart of their companies. As we have said, the technology is there. Unfortunately, it often feels that profit is put before child safety and it is unfortunate that we have had to have an Act to start seeing some of that turn already.

Q151 **Anna Firth:** Following on from that, given the harms that we have seen, is it not self-evident that the companies must recognise now, even if they did not right at the beginning, the harms that some of these apps and social media platforms create? Therefore, is there not an even greater onus on them now to clean up their act when it gets to age verification?

Deputy Chief Constable Critchley: I could not agree more. The apps will create a legal responsibility but ultimately there is a moral responsibility. They cannot help but know there has been an increase to 37 million referrals into the NCA from the National Center for Missing and Exploited Children in relation to child images that have been identified and referred. They have come from industry themselves, so they cannot help but know the harm that is already on there and I could not agree more in terms of the action that is required.

Q152 **Anna Firth:** We should not have to wait 18 months. They should do it right now. To what extent are social media and tech companies to blame, and to what extent do you think they recognise and know about the harms that they are creating?

Jessica Edwards: I completely agree with what Ian Critchley has said around the responsibility of tech platforms in this space. We do know that some are implementing tools that are more positive—for example, things around hash matching or parental controls—but a lot of this is tinkering around the edges and is not really getting to the root of the harmful content. We need to see safety by design on these platforms and a real overhaul of the system.

In terms of what tech companies do know, many accounts from whistleblowers and leaked documents show that for many years social media sites have been aware of these harms—this is not something new, unfortunately—but have failed to take action. It does feel as though, as Ian Critchley said, the pressure should not need to come from legislation, but unfortunately it is, and hopefully with the implementation of the Act we will start to see a change in how they face online harms.

David Wright: One of the things that we would like to see, which is one of the things that we lobbied hard for, for the Online Safety Act is about improved reporting mechanisms. As the prelegislative scrutiny committee



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in December 2021 concluded, the reporting mechanisms on platforms can lack transparency and can be difficult to navigate. In fact, one of the things in the Online Safety Act is an individual's rights to impartial appeal, which is what we had before the Online Safety Act, which it now does not. It is not included. The Secretary of State has powers to implement an alternative dispute resolution mechanism, but that is going to follow an Ofcom report after two years, and that two years only starts in two years' time, so we will have another four years go by before there is any form of report from Ofcom around the need for an impartial dispute resolution mechanism, one of the things that we see harm occurring in all the time.

I think the point is not lost here that time just goes by. It is encouraging that we have some momentum, but at every moment there seems to be just more delay and more time. The DSIT consultation on super-complaints proposing a 150-day period that a super-complaint should operate under, with a block of 30 days to consider this and then another block of 50 days, is just all days. From our perspective we say this, and I am sure we all say this, we see harm happening day in, day out, and with a block of 30 days to consider and assess something, that is 30 days of time we have lost. There does not seem to be any sense of urgency in all these things. I appreciate they are very complex, but harm happens all the time.

Chair: The ability to address it especially. I will bring in Andrew Lewer.

Q153 **Andrew Lewer:** Following on from that, what do you think the social media companies should do to address those high numbers of underage users that you have talked about? We have heard about countries such as France trying to introduce very strict age verification measures for social media. Should the UK do the same? Is it possible for the UK or anyone to do the same? I will start with Jessica.

Jessica Edwards: I think when we look at a lot of the provisions in the Online Safety Act, what is key is understanding what a child's account is and what an adult's account is. A lot of the measures do depend on that. Because of that it is going to be absolutely essential to implement accurate and strong age assurance across social media and other platforms to ensure that we know who we are able to protect and the accounts we do not want to interact with one another.

For pornography and the more robust age verification that would assess a user as 18 or not, we do know that this happens across the board and has for many years for other areas that are used every day; for example, online gambling and buying alcohol in a weekly shop. It is used across the board already and it is nothing new in extending these regulations to online. They can be done in a privacy-preserving way. A lot of the age verification platforms operate a double blind model, so they do not know which site you are going to access, and the site that you access does not know any information about you other than that you are over 18.



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The technology is there, and when this regulation does come into force the technology will continue to develop and get more robust and stronger as well.

Q154 **Andrew Lewer:** The essential line I am picking up is that these companies have vast amounts of information and super-sophisticated algorithms and they are able to push all sorts of things to you individually. Therefore, if they can do all those amazingly directed things, surely they could do something this straightforward.

Jessica Edwards: Completely, and they have the money to do it as well.

Andrew Lewer: Are there any additional comments?

David Wright: A lot of our effort at the moment is working with tech companies to try to get them to integrate the StopNCII hashes. We have these hash lists that will instantly enable them to prevent other people uploading the same content. We have nine of the biggest platforms. Hundreds of platforms should be taking these hashes and acting in the same way and empowering them to prevent harm.

Q155 **Chair:** Which of the biggest platforms are not on that list? TikTok?

David Wright: TikTok is. Google is not. Microsoft is not.

Deputy Chief Constable Critchley: There are two big areas for me. We have already discussed age verification. That is so significant and the technology is there to make sure that it does what it is there for and what the public and parents expect it to do.

The second is report and remove, which is an important element to it, but to prevent in the first place is the key bit because that is where the harm starts. If we can prevent it at upload and prevent it getting on the platforms in the first place, it will significantly reduce the harm that is caused and the consequential demand on the services required to support the victim and that young person, which are significant, and the consequential demand on the services like policing and the NCA to identify and deal with the offences.

We need to put our resources where people commit the greatest harm, but we have to put in a huge amount of resources because we have this normalised behaviour, sharing indecent images, often between young people. That can be prevented. It can be prevented at source, at upload, which is where I would like to see the greatest impact of the Act and the changes for companies.

David Wright: May I make one other point, which is sort of connected? In 2020 we at the Revenge Porn Helpline supported the National Crime Agency with Operation Makedom. An offender was successfully prosecuted in December 2021 for extorting images from women and girls. We set about finding the victims, who were women. We found 200. He got a 32-year sentence in December 2021. We reported 162,000 images of adults



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and had 147,000 removed. We cannot get the 15,000 residual images removed.

With the Internet Watch Foundation, we approached ISPs because we can create an empty URL list, put these 15,000 URLs in this list and distribute it to ISPs, like we prevent access to CSAM. The ISPs said, "We cannot do that because the content is not illegal". We have 200 victims and we have had a successful prosecution. We cannot remove all their content that was posted online. This is of adults so I grant it is a slightly different subject, but we enduringly grapple with it.

Chair: That seems unreasonable, it has to be said. Vicky, can I bring you in?

Q156 **Vicky Ford:** Hold that. I will go slightly off these questions. Let me deal first with this issue of child sexual abuse images.

It has been, for a long time, illegal to share child sexual abuse images. It is illegal to produce a pornography manual telling people how to produce child sexual abuse images. I am told it is not illegal to produce a manual telling people how to AI-generate pictures that look like children being abused. I am working with the Internet Watch Foundation to table amendments to the Criminal Justice Act to up that.

Ian, on the point that you made about images of adults where they have successfully raised a prosecution, if we should get wording into the Criminal Justice Act, let us get that going through Parliament right now.

Quickly, should we look at any other areas in the Criminal Justice Act amendments? We need to get them tabled this week.

Deputy Chief Constable Critchley: Thank you, and thank you for the work around AI. I work closely with the Internet Watch Foundation and Home Office colleagues and many others around our approach to AI.

Vicky Ford: Quickly?

Deputy Chief Constable Critchley: With AI particularly, my concern is the freely available tools, not just the manuals, that are not regulated and can be used by anybody—

Q157 **Vicky Ford:** Making it illegal to produce an AI-generated image of an AI child being sexually abused?

Deputy Chief Constable Critchley: An AI child is illegal now, the tool to be able to do that requires regulation around the ease of availability. No tool should be able to be used to nudify or create a child sexual abuse image. I will not reiterate some of the other points I have raised.

Ian Mearns: Sorry, Ian. Can I suggest that you correspond with Vicky immediately after this meeting rather than go through that evidence in this public session? Would that be all right?



Vicky Ford: All right.

Deputy Chief Constable Critchley: Absolutely.

Vicky Ford: And any other more specific—

David Wright: Yes. App stores also have a role here. Nudification apps are freely available on app stores. Some 90% of deep-fake content is pornographic and 99% of that features women and girls, I guess, by virtue. Some of the nudification apps available at app stores work only on women.

Q158 **Vicky Ford:** Thank you. You have spoken about the importance of point of sale and you have spoken about the need to protect people during the time before the Online Safety Act is implemented. I hear what you have said about parental controls not being the golden solution and how we should not just blame parents but have social media companies involved as well. Brianna Ghey's mother has strongly called for a child's phone, which would mean children could access only certain content.

Would you support a requirement at the time of point of sale of a phone that the seller of a phone needs to verify the age of the user and make sure that parents have access to parental controls over that phone? I understand it is not a perfect solution, but would you support such a requirement on the seller of a mobile phone?

Deputy Chief Constable Critchley: We can hear no more powerfully than from Brianna's mother around the impact. When we talk about online harm, the greatest degree is to lose a child in such tragic circumstances. We must push it as far up the line as we can in terms of keeping children safe.

We have talked a lot today about online companies, but point of sale is a huge opportunity. There is not enough advice and information. It is so difficult. I know from personal as well as professional experience how difficult it is to navigate through the safety of a phone that a child, once it is in their hands, can quite easily navigate back through to the position they want it to be in.

We should not underestimate the impact the pandemic has had here on young people's usage and their ability to navigate. I have talked before about seven to 10-year-olds. We are not talking about teenagers now. We are talking about the ability for young people to navigate their way through the systems. I support any requirements that put a further onus at the point of the sale to make sure that all safety requirements are in place for the user.

We can then talk about the content, which goes back to the heart of being online. There should be no content that causes harm to children accessible to them on their phones. That ultimately comes back to the companies themselves as well as the sellers.

Q159 **Vicky Ford:** David, I know it will not deal with a second-hand, hand-me-



down phone.

David Wright: No, it will not. The opportunity to have more information and more awareness at point of sale will be great. I fear for the procurement processes for hand-me-down laptops and tablets, which are not necessarily mobile phones, whether through Amazon or online. Yes, there is an opportunity, but it will not be a silver bullet. Achieving that through schools, public awareness campaigns, information for children, information for parents and information for schools is probably more the thing.

Q160 **Vicky Ford:** More thinking about a requirement on the retailer to verify the age, like for buying alcohol. Clearly, the implementation of the Online Safety Act is taking a long time. The pornography age verification is meant to be the first implemented. Is it taking too long?

Jessica Edwards: It is taking as long as the Act mandated. It is difficult because it needs to be implemented quickly and to be implemented robustly, efficiently and effectively. Balancing that is key.

As Ian was saying earlier, Ofcom could maybe play a role in engaging with the tech platforms now and starting to have those conversations around regulations and the protections it will put in place to ensure that it happens. It can happen before the implementation. It does not have to happen when the implementation kicks in. It is a tricky balancing act.

We engage with Ofcom on its consultations on its codes of practice, as I know other charities do, and continue to work with it on that.

Q161 **Vicky Ford:** I have been told that the consultation process is incredibly opaque, bureaucratic, technology jargonistic and so on, and that parents and children find it hard to engage in that. Jessica, you spoke about the importance of any guidance being totally legally robust, but is the balance right? Ian spoke about the need for greater awareness of the Act, but how do we get this balance right so that people feel that this guidance is being driven by the user and not by the tech company that wants to cover it in jargon that nobody understands?

Jessica Edwards: I agree with that. Even charities find the consultations technical and long. The illegal harms one is about 1,700 pages long. It is definitely not, at the moment, a system that children, young people and parents can engage with.

We push for children and young people in particular to be at the heart of some of the proposals that Ofcom is suggesting. How can we engage with them to make sure that it would work for children and it is what they want and would protect them? We will continue to do that. It is definitely an issue and, across the board on online safety, we can ensure there are child-friendly versions of the guidance and the Act itself, which is long, to make sure that that awareness is there and that children and parents understand what the Act is trying to achieve.



Q162 **Chair:** Thank you. An issue has been raised with the Committee. Baroness Kidron told the Committee as a result of the Online Safety Act being exempted from school settings, children's data could be more protected outside the classroom than inside it. Do you recognise that issue and, if so, what could be done to increase those protections? If not, do not worry. We can look at it in its own right.

David Wright: Repeat the question again.

Chair: Baroness Kidron gave evidence to the Committee suggesting that because the Online Safety Act exempted school settings, the risk was that children's data could be better protected outside the classroom than inside it. Have you come across that as an issue? If not, do not worry.

David Wright: Schools are, clearly, outside the Online Safety Act. Child protection and child safeguarding systems are outside the Online Safety Act so it will have little impact in the classroom, short of awareness. It is there for us all.

The data protection legislation that is going through will have more of an impact, but I recognise Baroness Kidron's comments and the work she is doing in this space about this, too, shining a light on some edtech providers.

Q163 **Chair:** Where data goes and the issues there. Ian, do you have any views?

Deputy Chief Constable Critchley: It would be helpful to understand the specific context of the exemption to be able to give you appropriate commentary back on the risks that have been pointed out.

Chair: You are right. It relates to data, primarily, and where that flows. It has been an extremely helpful session. Thank you very much to all our panel. We will move on to the Children's Commissioner. Thank you for the evidence you have given today.

Examination of witness

Witness: Dame Rachel de Souza.

Q164 **Chair:** Welcome back to the Education Select Committee. As Children's Commissioner, you hear from children all over the country concerning issues that affect them. What have they told you about online harms? We all recognise children grow up in a digital world but, overall, is the view that you hear from them more positive or negative?

Dame Rachel de Souza: In their approach to the digital world, children are positive. They are digital natives. It is part of their life. However, coupled with that is extreme seriousness about the safety issue and extreme concerns about the safety issue from children.



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Let me give you a sense of this. I spoke to this Committee about our Big Ask survey, which got 500,000 responses. I have been out over the last few months doing our Big Ambition survey. We have now heard from over 1 million children. One question that we asked them in both the Big Ask survey and the Big Ambition survey was about safety. Did they feel safe? Sadly, I do not have the exact figure because we are saving it for our launch on 25 March, but I can tell you that children feel less safe now than they did when they answered the Big Ambition. There is a real safety concern.

Last week I had a roundtable with all the tech companies. I brought them in, including Google and X, which the kids called Triple X. I had my young ambassadors with me to ask them questions. It became clear that the experiences that the young people were asking the tech companies about were things that happen in their everyday lives online around safety and things that happen to teenagers and children whenever they are online all the time. They were talking about ads and financial scams and loot boxes. They were talking about seeing images that they did not want to see. They were talking about pornography. They were talking about violence. They were talking about bullying. They were talking about fakes. This was a group of kids who had applied. We did not brief them. This was their normal everyday experience. That is the reality there.

The problem for me is that this happens very young. We have done loads of research ever since I came into the role in 2021 when we were coming through Everyone's Invited and the Ofsted review. The Government asked me to look at keeping children safer online. We have done more nationally representative research in more areas all this time. Some of our more recent research shows that half of children aged 13 have seen serious pornography. I am not talking about top-shelf mag stuff. I am talking about coercive, unpleasant, horrible things. About 25% had seen that at age eight or nine. Often, they might not have their own phone and someone is showing it to them. This is a problem.

I have been around the country on my Big Ambition tour, doing the qual. I have talked to every single child in prison. I have been to mental health wards. I have been to schools and youth clubs in every part of the country. On this issue, I always ask, "When did you get a phone?" The answer is normally 10, 11 or 12. A small number say that their parents did not let them have one until they were 14 or later, but mainly it is 10, 11 or 12. When asked if they have seen serious violence, it is every single one. When asked if they have seen pornography—and we talk about the question I am asking—it is every single one.

We need to recognise the reality of children's lives. In terms of safety, given that that is children's experience, I can only ask the Committee to answer that question. I know how I would answer it.

Q165 **Chair:** The theoretical age of digital consent is 13. Clearly, 25% of children having seen pornography much younger than that shows that that is not



working to a large extent. We heard about proposals in France and a law that had been passed to treat children between the ages of 13 and 15 differently and to have greater parental supervision, greater oversight of use of social media from that group. That law has not come into effect because it sits at an EU level of competence. Would something like that be welcomed by many of the young people you have spoken to in this country?

Dame Rachel de Souza: It is interesting. To give you a sense of how and why I will answer like I will, we did a neat piece of research in 2022, a nationally representative survey of 2,005 children aged eight to 17 and their parents to understand whether they were on these platforms underage. To give you a sense of it, we found across the seven platforms surveyed, between 36% and 79% of users aged eight to 17 are under the minimum age in the terms of service. WhatsApp, 79% were on underage, YouTube 50% were on underage, TikTok 44%, Snapchat 41%, Twitter 39%, Facebook 38%, Instagram 36%. Children are on these platforms underage and their parents know they are.

On the question about what the French do, I have been watching with huge interest and I want to go over and see how. We can pass legislation and we have groundbreaking legislation going through, but implementation is everything.

What have they focused on? They have focused on banning mobile phones in schools. They have focused on the amount of screen time. Now they focus on involving parents in age verification. They do well—and we are starting to do this—at having a proper national conversation about how they want their children’s experience to be.

I am interested to see how they implement what they say. The French are different. Culturally, the French get involved particularly in the upbringing of children, who are at nursery from two and a half. Their school life is much more full-on. We have some questions to answer as a nation about where we sit on freedoms versus involvement. We need to watch it.

I have been pushing back on the tech companies and saying that their age verification should be so good that they should know how old the children are onsite. Of course, children underage should not be on there, but we see massive use under age.

Q166 **Mohammad Yasin:** What is your assessment of the Online Safety Act 2023 as it stands? Is it robust enough? If not, why not? Can you talk us through which of your recommendations were not incorporated into the Online Safety Act?

Dame Rachel de Souza: Yes, I would love to do that. It has been a long journey. I have been involved with the Online Safety Act for years and many of you have, too. I am pleased it is through. It is landmark legislation. I am pleased that it puts the onus on tech companies to make the platforms safe for children.



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Good legislation though it is, there are two things. Implementation will be everything. It is all very well to have the legislation. The implementation of the children's code and how Ofcom deals with it will be important. Also, before I go into the detail, especially as the Act had such a tricky journey at the end, perhaps not everything we wanted is in there, but we do have the facility to keep improving it and adding things. For example, AI is now becoming such an issue. We would want to look again particularly at the secondary legislation and bring that in.

In terms of what is good and what is missing, first—and I have alluded to it—we need a duty of care to hold platforms accountable when children experience harm. We need that. I am pleased the children's code of practice is coming in. Everybody has a duty to keep children safe. It is the first time we have had legislation that pushes that back. It is important.

The second is another of my recommendations that was incorporated. We require all platforms likely to be used by children to be in the scope of the Bill. Anything user to user is in the scope of the Bill and that is important. Not all platforms are in the scope of the Bill. I am keeping my eye on that. For example, when a child looks at a blog or does something on their own, it is not there. My recommendation there was not incorporated, but I am pleased that the user to user is incorporated.

I called for the requirement for risky platforms to establish which accounts belong to children and offer higher levels of protection to them. My student ambassadors pushed back at me a bit on this. They said it should be safe for everyone and forget the innovations of children. Everywhere should be safe for everyone. We should not be seeing things. However, requiring risky platforms to protect children is important.

That is incumbent on the porn companies. Vicky Ford helped me pull the porn companies in and challenge them and make sure that they were in scope of the Bill and submit to that. We did that piece of work back in 2021 and I am pleased that that is there and is incorporated. It covers all pornography sites and services. I called for that. That happening is a big positive.

I called for the aligning of online and offline laws and protections. That was not included, but I hope that that will be addressed in the pornography review.

Empowering children's voices and rights in the digital world was included and has been part of the process of the Bill and I am pleased about that.

There has been so much change in Secretaries of State and who is dealing with it. I have not been able to sit down and say, "Why did you not include these bits?" I have had various discussions but, in summary, that is what I called for and what was and was not included.

Q167 Mohammad Yasin: Parents I speak to, even when they are tech-savvy, are concerned that they are unable to keep pace with the changes in the



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tech trends their kids are into. In your view, does the Act offer support for parents, teachers and guardians to effectively consider and provide an adequate framework for dealing with emerging or future harms?

Dame Rachel de Souza: This legislation puts the onus on tech companies to take down material that should not be there, to age-verify children and to keep them safe, but parents and schools still have a massive job. No one should rely on the legislation solely to keep children safe. As I said, I had the tech companies in last week and challenged them, "Why do you not work together to do more to educate parents about the online world?"

PSHE and RSE are huge issues as well and I am happy to talk about either of those. We did a piece of work called "What I wish my parents had known". It can seem like, "Parents, you must do this". We got hundreds of kids into the DfE, 16 to 21 year-olds, and asked, "What do you wish your parents had known? If you were the parent and it was your little brother or sister, what would you want done for them?" They told us, "We want a childhood. Children should not be given these things so early and they should be able to be free and play". They told us that they love their digital experience and they like being online and most of them, now they are addicted to their phones, would not want their phones taken away, but they do want boundaries. They talked about how parents should not let them take their phones to bed at night and should have boundaries around screen time. This was the young people themselves.

When I asked them, "When you have children, would you let them have a phone at 11 or 12?", absolutely not. I would recommend this. They also wanted their parents to talk to them early and often about the things they see in the online world and not just have that one conversation about, "This is what sex is. This is what pornography is", and then run out of the room with a red face. They wanted age-appropriate conversations. They had lots of fun talking about those experiences, but that also needs supporting.

I will also add parental behaviours. I am not being judgmental. I am a mother. I know how hard this is. I took a cab down here and I cannot tell you how many people were watching their phones and walked into the road. You see parents with kids using their phones at dinnertime. We cannot say, "I will ban you from having this" but then as adults act in a totally uncontrolled way, scrolling at night. We need our parents and adults in the country to have this conversation about our own addictions. Talk to Molly Russell's father about his heartbreak over his daughter scrolling through those hideous images at three in the morning. Then she took her own life. The coroner looked at it and felt disturbed. Helping parents with boundaries is important.

I told the tech companies last week that they should be working together, not thinking of these things as extreme innovation but thinking of them as the norm, and funding good parental education and parental support about the reality of life online. The children and young people said, "We want our parents to know and understand this. We want to be able to talk to them about it". They described when they come home from school and their



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mum asks if they had a good day and they just grunt. They said, “Mum, keep asking”, because they see horrendous things on there and they trust their parents and want to be able to talk to them about it.

We did not grow up with this. I had a completely free childhood. I never phoned home. We would be out to play and be back for tea. Their lives are completely different. As parents and adults, we need to wake up and, also, watch our own behaviours.

The tech companies are multibillion companies. Google is planning its family whatever and I am sure that is good, but they should be on the case with safe by design and parental education and getting on top of this, not just for phones but across the piece.

Q168 Mohammad Yasin: Finally, some parents do not have English as their first language. What is your advice for them?

Dame Rachel de Souza: It is the same for all parents. It is interesting because you can love tech and the digital world and see its value. For parents where English is not their first language, you can use tech to translate and to look at things. You can know that you want your child to be good at tech because the future is tech. It is the same for all parents. However, not feeling worried about putting boundaries in is a good message and the messages are the same across the piece. Recognise that you do not in any way disadvantage your child by having boundaries and standing up and saying no when you need to say no.

Q169 Vicky Ford: I want to talk about some of the areas that are not covered by the Online Safety Act. Clearly, some areas need stronger protection and AI-generated images of child sexual abuse is an issue. Have you looked at putting amendments into the Criminal Justice Bill? We need to table them this week, probably, to capture and update that more.

Dame Rachel de Souza: It is interesting because AI developments go at such a pace. It is a smart move to think about getting in early and thinking about legislating early.

I am pushing so hard for a vape ban to try to get it in before it becomes ubiquitous. It is hard to shut the doors after the horse has bolted.

Again, when I talk to young people, all the talk is about AI, its possibilities and its problems. They see it as the future. If we are not careful, that will happen and we will be running from behind.

Definitely, the Online Safety Bill with its secondary legislation is open to some of the thinking about that. It was always developed that way.

Q170 Vicky Ford: Another Bill is before Parliament at the moment that covers areas like child protection, child sexual abuse images online and updating those for AI.

You have spoken about the need for parents to work with children to have control. Do you support age verification at the time you buy the phone to



make sure that parents get access to parental control and advice and parental control at the time they buy the child's phone?

Dame Rachel de Souza: As long as it is coupled with a proper campaign of parental education, it could be incredibly helpful. We should look at every innovation possible to nail this down because parents talk to us about how they do not understand parental controls. It is a concern. That is why I am pushing the parental education side as well as anything technical that can help us that we should look at.

Q171 **Ian Mearns:** Thank you very much. You have already alluded to this, Dame Rachel. You have previously published evidence highlighting the huge number of underage users on social media platforms. Apart from the fact that they can, why do you believe such high numbers of underage users access these websites?

Dame Rachel de Souza: Honestly, because they can. It is the playground. We should not underestimate—and we often need to be self-aware when thinking about this—addiction and social media and the brain. We have these young developing children's brains that are even more susceptible than ours are to the dopamine hits. That needs saying. Also, they see us entertaining ourselves. They see us doing it. It is a combination of all those. They are even more in the online world than we are so it is the norm. A range of things are concerning.

Ian Mearns: It is probably just me, but I do not find it entertaining at all. I find it worrying. You are bombarded with a huge amount of news content all the time. I find an awful lot of it deeply depressing. It is worrying. I am possibly looking at it from the wrong perspective because I do not find using my mobile phone at all entertaining, I am afraid, but there we go.

Q172 **Chair:** On the point about dopamine, we focus on social media a lot, but young people are in many ways targeted by gamification in this space, which provides that dopamine reward. In your research, have you come across young people's concerns about that and about the extent of online gaming and the risks entailed in that?

Dame Rachel de Souza: Yes. In fact, it is often a hidden bit of the conversation because, again, gaming is relatively ubiquitous. Children, young people and teenagers often raise two concerns around gaming with me. One is the child whose life becomes playing that game. Again, the solution from young people was around boundaries, time and keeping balance in a child's life.

We also challenged someone from UKIE at our roundtable on the ads and the loot boxes and the pulling into debt. The companies will say, "No, children do not see that", but they see it every single day. That is true. It was great to have those young voices giving that challenge back. The answers were inadequate.

Q173 **Ian Mearns:** You have said that the media companies know. Do you believe that the social media companies are aware of the scale of the



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problem? What should the social media companies in particular do to address the high number of underage users?

Dame Rachel de Souza: Again, implementing the legislation will be interesting. I am a statutory—

Ian Mearns: It is interesting, but is it—

Dame Rachel de Souza: No, I am answering your question. I am a statutory consultee on the children's code. My name is on the face of the Bill. I am waiting for Ofcom to deliver its children's code. We have some consultations out because we can see some teeth there to hold the social media companies to account.

If you ask me whether they are aware, of course they are aware. Have I been reassured by any of their answers, no. They should take down—

Q174 **Ian Mearns:** Do they feign lack of awareness?

Dame Rachel de Souza: Yes. I feel huge amounts of money are put into marketing and managing these discussions. I get well-rehearsed responses. I have had them in over the past two years to talk about how many underage children are online. I was not satisfied by the responses. I wrote to them about that and have continued to write. The children's code should hold them to account on that.

I am worried about them not taking down images and things that will be in the children's code like the extreme dieting material and the pro-suicide material. Some are illegal and some are harmful, but they will have to take those things down. They could do that now. They could step up and do that now.

On age verification, I believe they do know and they should get these children offline now. They do know who is underage and they could do better at age verification. I am somewhat cynical about the responses they give me and I challenge them. I had a discussion with them about pornography and appropriate images for children who are 13 or 15. They gave me the spiel and then I picked up Twitter or Snapchat and showed them, "Look at this porn. Look at this." Children first see porn on Twitter. Then it is the porn companies. Then they see it on Snapchat and Meta.

The companies try to do some positive things but they could do way more. My view is that during this whole process they could have stepped up and sorted out these problems. I will jolly well make sure in my role as statutory consultee to that children's code that they are held to account because that is the job. That is what we have to do now.

The Online Safety Bill is the adults of this country and the parents of this country standing up and saying, "No more". This has to be a line in the sand. I will fight hard for it. We want to see these social media companies do some good with some parental campaigns supporting children getting



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into education and leaning in more. We want to see that. Sort out this mess.

Ian Mearns: Maybe an honest thing that they have done is to rename Twitter "X": just a thought.

Dame Rachel de Souza: My ambassadors speaking to Twitter, Snapchat, Meta and all who were there said to them, "We want a childhood. This is about our childhood, not your livelihood". We need to get back that balance.

Q175 **Ian Mearns:** I am afraid to say that an awful lot of these conversations will simply be guided by their bottom lines.

We talked earlier about countries such as France aiming to introduce strict age-verification measures. Do you agree that we should do exactly the same and try to implement it as such?

Dame Rachel de Souza: As a parent, with your under-18, you should be a key player in that conversation. I will look at the French model and I want to see it implemented. It sounds like a great idea. I am positive about that. I want to see that it can work.

Obviously, everything I say is guided by safeguarding. We do not want any child to be disadvantaged because their parent cannot support them or there is a safeguarding issue in the relationship. That aside, it seems positive.

Q176 **Ian Mearns:** The devil would be in the detail of implementing and policing, but does the Online Safety Act adequately address the protections needed for children accessing these sites with adult content?

Dame Rachel de Souza: It does what legislation can do. It will hold the tech companies to account with a proper children's code. We can do so many more things. I have talked a bit about what the adults and parents of this country need to do. In schools, I want that RSE curriculum to deal with what children see online and these issues.

Why am I so worried about the school RSE curriculum and why is it important? First, the adults that children often said they trusted to guide them on these things are in schools. They look to their teachers and they look to their head teachers. Also, the things kids see influence their behaviour. I have shown that in my own research, where we looked at peer-on-peer abuse. We need to lean into a proper RSE curriculum. Why did Ofsted do subject reviews on every subject but RSE? That is my first question.

Ian Mearns: This Committee has raised that point.

Chair: This Committee has raised that point once or twice, yes.

Dame Rachel de Souza: To give you a sense of this, Chris Whitty and I appeared at the Women and Equalities Committee a couple of weeks ago



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to give evidence. Do you know that our gonorrhoea rates are the worst since 1918 and our syphilis rates are the worst since 1945 and that the second-fastest group getting these Dickensian diseases are children, with one 13 year-old diagnosed every day and about 400 a year diagnosed?

That, to me, speaks of kids getting their sex education from TikTok and not taught properly by the trusted adults at school and by their families. We have been in all sorts of debates about what should be in this curriculum and issues about all sorts of things but, actually, basic health education and keeping yourself safe online are what head teachers should be doing. Heads say to me, "I am not sure what the guidance is". We need to give them the strong supportive guidance to do this work. Those figures are absolutely shocking.

Q177 **Anna Firth:** Thank you very much, Commissioner. It is fantastic to hear such sound common-sense research and effort going on in this area. Thank you for your evidence.

I would like to ask you about so much but time is against us so I will focus on the guidance on mobile phones in schools, which this Committee has called for and which came out yesterday. First, were you involved in creating that guidance?

Dame Rachel de Souza: I was invited to one roundtable to look at the evidence from academics and to take evidence from educationalists, and I have had conversations for a long time about it across the sector and with the Secretary of State, the Civil Service and others.

Q178 **Anna Firth:** Excellent. Secondly, what is your assessment of the effectiveness of the guidance? Are you happy with it being non-statutory? Would you prefer it to be stronger along the French model? What is your opinion of it?

Dame Rachel de Souza: I cannot help but answer this one by referring back to my own experience as a head teacher in school. They will have to deliver this. Probably around 2010 when I was a head teacher for the second time, social media started to affect schools. I, basically, restricted the use of mobile phones, banned them, if you like, "No, I do not want any mobile phone to be seen in the building. If it is in your bag, fine". We had children coming from a long way away who needed to track their things and children with type 1 diabetes who needed to check. Those things aside, it is great at school to have a mobile-free zone. Most head teachers do that.

One piece of work I would like to do is to use my statutory powers to check every single school in the country to see who is and who is not, to understand that, because we do not have a clear picture. My gut feeling is that most do restrict mobile phone use. For me, I welcome the guidance if it gives more power to the elbow of heads to go the whole hog and deal with this.



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We want our children in school talking to each other and learning those social skills. I am not anti-tech; I am pro-tech for learning. But you do not need to be on your mobile phone in school in the day. The problems that ensue are huge.

Q179 **Anna Firth:** You push at an open door with this Committee on that point. The guidance does not cover school trips. My feeling would be that you do not want mobile phones on school trips. The children are taken away to experience a different environment, medical exceptions of course allowed.

Dame Rachel de Souza: Again, many heads have them out of sight. It is the same rule for behaviour out of school as in school. Having mobile phones out of sight and not used is sensible.

Q180 **Anna Firth:** Do you have any other points on the guidance at all? You may not have had a chance to digest it fully, but are there any immediate areas that we should write to the Secretary of State suggesting tweaks?

Dame Rachel de Souza: The best contribution I can make is to find out whether any schools do not ban mobile phones and to understand that. The guidance is sensible. Many heads do this already. Generally, most people say, "Great".

We have to support our parents and teachers with this peer desire to buy an expensive mobile phone that makes you a target for theft as you walk to school. This is a good step towards moving against that, "I need a mobile phone for school. I need a mobile phone". Some children—a small group—do need one but most do not.

Q181 **Anna Firth:** Of course. Lastly, you said that in one of your roundtables the young people said they wished they had not been allowed to have a phone at night. You talked about Molly Russell at three in the morning. That was over six years ago. Is it time for schools to educate parents on the importance of sleep and of having those hours in the night when your bedroom is a sanctuary and when you do not have screens or phones emitting blue lights or any other harms?

Dame Rachel de Souza: Again, you push at an open door with me on that one. We know that for good mental health and for our own health throughout our lives, good sleep is important. We know the problems of blue light. No tech in the bedroom is a good piece of advice from early as well.

I want to push back and make sure that the tech companies should support that parental education. I want them to fund it and support it. In our RSE and our science lessons, we should talk to children about keeping themselves healthy and well. Keeping a bedroom free of light at night is key.

Anna Firth: Given that we have 18 months before the Online Safety Act comes in, now is the moment for tech companies to step up and lead that educational, public health, digital hygiene push.



Dame Rachel de Souza: Absolutely. Also, this would be a great collaboration between education and the NHS. I would love to see the tech companies working together and putting some proper funding in. Kids know the interface between their physical and their mental health. They know that. Great sleep is part of that, as is getting to bed on time, as is getting plenty of light and fresh air and things like that. These basics are finding fashion again with many a Californian neuroscientist podcaster. We should teach these in a new and fresh way. Herein lies the answer to many of the issues.

Q182 **Andrew Lewer:** Thank you. I will come back to AI. Vicky touched upon it. Given this platform and presenting to an adult audience that does not always get this, what is the actual effect of the increasing use of AI by children online? What does it do that is either positive or causes you concern? What is this issue?

Dame Rachel de Souza: I am not an AI expert and you could get far better people to come in and talk through that, but you have a world of possibilities opened and about to be opened with it. If you get on ChatGPT and ask it a few questions, as long as you ask the right questions, its responses can be amazing. There are huge possibilities in developing careers and children's entertainment experiences.

A problem that children worry about is how it will allow new forms of bullying. Fake images are a big concern for children and worries around fairness. Are we set up to make sure assessments and homework can screen out when something is produced by AI or produced by you? Children come up with a whole range of issues, which my office certainly want to look at.

On the one hand, we want to keep the positives, but we need to be truly aware of the problems and not get ourselves into the situation we are in with social media. Back in 2010 when I was a head teacher, Facebook caused massive problems in my school. We are now trying to do something about it in 2024. We do not want to be in the same situation with AI. We want to embrace its possibilities but get ahead of the potential problems as best we can.

Q183 **Andrew Lewer:** You describe some of the complexities and the possibilities that we try to grasp at and explore.

Dame Rachel de Souza: Yes, it is emerging.

Andrew Lewer: If it emerges only at that stage, how do you come to a view about a definitive piece of legislation when the concept is quite vague and the possibilities are not well defined?

Dame Rachel de Souza: The principles of the Online Safety Bill and the legislation and our ability to update that should suffice. We look at harms. We look at anything illegal or anything for children that is harmful. I am talking about children here, not the adult world. The principles are there. The experts are there. They know what is coming. We need to start to have



these conversations now. I am not telling you that I have the answer but we need to have the conversations now.

Q184 **Andrew Lewer:** We would like to do lots of things. The numbers you were talking about and the numbers that the previous panel was talking about were huge. Therefore, resources to deal with all that are limited.

How do we decide in terms of chasing after AI abuse, which is deeply unpleasant but is not a real person, versus the resources available to chase after actual abuse of somebody, rather than imagery that is unpleasant but does not have a human being involved?

Dame Rachel de Souza: Some of the abuse I have already heard children experiencing in the metaverse has been horrific so I would not underestimate the safeguarding issues. Abuse is abuse.

Q185 **Andrew Lewer:** No, I would not underestimate the safeguarding issues, but we all have to accept that we have an amount of resource to tackle abuse and, therefore, it has to be prioritised. Should it be prioritised on virtual, which may encourage bad behaviours but is virtual, or imagery that uses real children and real people?

Dame Rachel de Souza: One of the most profoundly disturbing things I did was to get a briefing from the NCA on the numbers of adults with inappropriate interests in children online. If children engage with AI-generated images and there is a paedophile behind that, it is a paedophile whether it is online or offline. That can go from there to other places.

I would put no limit on what needs to happen if it is a safeguarding issue. We need to be able to look at those issues. It should not be a resource question. We need to keep children safe.

Andrew Lewer: I am not competing with you about how concerned we are about children online. I am making the point that we can say resources should be unlimited, but they are not.

Dame Rachel de Souza: I guess, again, if I go back and look at what the National Crime Agency is doing, where it thinks that these paedophiles and people who are a safeguarding risk to children are operating, that is where they operate. That is why. I was not dismissing your point at all or trying to undermine. Where there is new technology, you will find children and you will find people who want to do them harm. For me, that has to be a priority.

Q186 **Vicky Ford:** Can you give us an example of that horrific abuse in the metaverse so that we can understand when the virtual becomes real?

Dame Rachel de Souza: It was an example that I gave comment to, which was televised. It had been broadcast a year or so ago. A child had gone on and had virtually experienced being raped and sexually abused. It is not that it is not traumatic because it has happened there. It can be part



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of grooming. It is abuse in itself. We need to be serious about it. I am talking about children as well.

Q187 **Vicky Ford:** One reason we make sharing child sexual abuse images illegal is because adults seeing those images and those videos then attempt to carry out those same acts in the real world. Do you agree that it is just as dangerous for them to see an AI-generated picture of children being sexually abused as a real image of children being sexually abused?

Dame Rachel de Souza: Yes, and I would add to that. I did a piece of research with sexual abuse referral clinics. We were able to look at the transcripts from both abusers and people who had been abused and the police records. We could see clearly the influence of what had been seen online determining the actions. They were carrying out things that they had seen. The researchers on my website worked with a psychologist and two sexual abuse referral clinics. It is the horrific, dark side. Parents must be the most worried about this. We showed more than correlation.

Q188 **Chair:** During this session, we have heard concerns about the loopholes between digital content and offline content when it comes to portrayal or adults dressing up as children engaged in pornography and the issue of child sex dolls, which is particularly shocking and appalling. Presumably, you hope that the pornography review will deal with those issues. Who holds the pen on that and when do you expect it to come back?

Dame Rachel de Souza: You probably know more than me. I am meeting Baroness Bertin shortly. We have done a huge amount of research on pornography and I have shared that with her. We are as hopeful in the Office of the Children's Commissioner as I am sure you are that this deals with and sweeps up a lot of these outstanding issues, but I do not have a clear answer. I have not met her yet. I am about to meet her.

Chair: Thank you. That has been another useful and informative, if worrying, session. Thank you.