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By email

10 April 2024

Dear Chair,

Thank you for your letter dated 28th March, addressed to Matt Brittin, who has asked me to reply on his behalf.

We know the profound impact that non-consensual explicit imagery, or NCEI, can have on victim-survivors, and how distressing this content can be. We want to reassure the Committee that Google has been in regular dialogue with StopNCII since its launch. We haven't been able to join due to specific policy and practical concerns about the interoperability of the database, which have been communicated to SWGfL. We're exploring possible solutions and would be glad to discuss with you if that would be of use.

We have actively developed and continue to build additional safeguards on Google Search – including tools to help people protect themselves at scale and ranking improvements to address this content. For example, it's been the case that for many years that people can have pages that feature this content and include their likeness removed from Search under our [policies](#). We've been working hard, year-on-year, to build on those existing protections. Recent updates include:

- **Updates to our Search policy for non-consensual explicit imagery:** Last year, we [shared](#) an update regarding an expansion of our policies that enable individuals to remove non-consensual explicit imagery from Search. Individuals can also [request the removal](#) of any personal, explicit images that they no longer wish to be visible in Search. For example, if someone created and uploaded explicit content to a website, then deleted the original content, they can request its removal from Search if it's being published elsewhere without approval.
- **Reporting personal sexual content on Search:** We've updated and simplified the forms individuals use to submit removal requests for their personal sexual content on Search (as well as websites containing personal information or other material that may be removed under our Search product [policies](#)). When an image is removed under our personal sexual content policy or involuntary fake pornography policy, we have systems in place to detect and remove duplicates of that image, to reduce the need for victims to request removals one by one. Of course, removing content from Google Search does not remove it from the web or other search engines, but we hope these changes give individuals more control over private information appearing in Google Search.

- **Proactive protections designed to combat NCEI:** We know that it can be difficult for survivors of NCEI to navigate removal requests from multiple online services and platforms. For this reason:
 - When image URLs that are reported via our NCEI reporting tool are found to be violative and are subsequently de-listed, systems are in place to detect and remove duplicates of that imagery from Search. **Using our own internal hashing technology, our systems detect and remove duplicates for the vast majority of NCEI imagery reported and removed from Search.** While Google makes best efforts to stop this content from appearing, we're aware that images can be modified to deliberately evade detection via current hash-matching technology. As a result, these "de-duplication" protections may not detect all manipulated (but visually similar) "near-duplicates".
 - If a user's removal request is approved, Google may filter explicit results for queries similar to the user's original request. Given the dynamic and ever-changing nature of the web, automated systems are not able to catch every explicit result; however, our goal is clear - to mitigate the need for users to continually submit removal requests.
 - If we process a high volume of such removals involving a particular site, we use that as a signal to improve our results. For sites that receive a high volume of NCEI removals, we [demote](#) other content from the site in our Search results.
 - Google provides [information](#) in the Search Help Center that recommends additional steps individuals can take when dealing with their personal sexual content online as well as resources for additional support. Google developed these recommendations and resources through consultation with external experts and survivor-advocates.
 - For Autocomplete, we do not allow predictions that promote sexually explicit content that are in violation of Google Search's overall policies and predictions that associate potentially disparaging or sensitive terms with named individuals. This includes predictions that:
 - May be related to harassment, bullying, threats, inappropriate sexualization, or
 - Expose private or sensitive information in a way that may cause harassment, identity theft or financial fraud.

We are actively working on all of the issues mentioned here and more improvements will be online in the coming weeks. We are also continuing to engage with Ofcom on this important topic in the context of the Online Safety Act.

Yours sincerely,

Katie O'Donovan
Director, Government Affairs and Public Policy, Google UK