

**Written evidence submitted by Office of the City Remembrancer, City of
London Corporation**

**DIGITAL, CULTURE, MEDIA AND SPORT SUB-COMMITTEE ON ONLINE HARMS AND
DISINFORMATION
INQUIRY INTO ONLINE SAFETY AND ONLINE HARM**

Memorandum from the City of London Police
Submitted by the Office of the City Remembrancer

1. City of London Police is the National Police Chiefs' Council Lead for Economic and Cyber Crime and National Lead Force for Fraud. City of London Police operates Action Fraud and the National Fraud Intelligence Bureau, funded by the Home Office, which is the national reporting and recording centre for fraud and financially motivated cyber-crime. It investigates serious, complex and cross-border fraud which is beyond the capability of local policing. It also provides training and continuous professional development for the police and private sector workforce through its Economic Crime Academy.

What are the key omissions to the draft Bill, such as a general safety duty or powers to deal with urgent security threats, and (how) could they be practically included without compromising rights such as freedom of expression?

2. There are two key areas of concern with the current provisions. Firstly, the omission of fraud as a priority harm. Across government there is a growing realisation of the spread and depth of the harm caused by fraud (now accounting for a third of all crime, as reported by the latest Crime Survey for England and Wales - 4.6 million fraud offences in the year ending March 2021). The degree of harm for individuals can be significant. Action Fraud call handlers have had to deal with 200 individuals expressing an immediate intent of suicide requiring a police response. Far from being a victimless crime, fraud is extremely harmful and the impact on victims can be long lasting, often with an unwarranted sense of complicity with the criminals as they may have given them access to their life savings.
3. The second omission is that of paid-for advertising for scam investment schemes. The platforms to which this legislation relates can make considerable returns on illegitimate adverts being placed on their sites, essentially profiting from criminal activity. Allowing these adverts to be placed can also give them an undue credibility with the public who may be under the impression that if the investments scheme was a scam, then it would not be allowed to be advertised on such a well known site/platform.
4. This Bill presents an opportunity to address both of these omissions and ensure that the public is better protected sooner rather than later, reducing the accessibility that criminals currently freely exploit to spread significant harm online.

Is it necessary to have an explicit definition and process for determining harm to children and adults in the Online Safety Bill, and what should it be?

5. It is difficult to see how measures can be effectively regulated and enforced if an explicit definition is not agreed. Without one, there is a risk of too much ambiguity of interpretation. However, this puts a heavy onus on agreeing an appropriate definition that does not unintentionally exclude any vulnerable groups from protection.

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