

Written evidence submitted by the Internet Watch Foundation (COR0134)

1. Scope of the response

- 1.1 The IWF's remit is distinct and limited to tackling illegal content, specifically online child sexual abuse material hosted anywhere in the world and non-photographic images of child sexual abuse hosted in the UK. For this reason, our response to this inquiry is limited to this specific area.
- 1.2 Our response is based on what we believe to be in the interests of those who have been abused and had their suffering compounded by having their imagery shared online.

2. About the Internet Watch Foundation

- 2.1 The Internet Watch Foundation (IWF) is a charity that works in partnership with the internet industry, law enforcement and government to remove (with the co-operation of industry) from the internet child sexual abuse images and videos wherever they are hosted in the world and non-photographic images hosted in the UK.
- 2.2 The IWF exists for public benefit and performs two unique functions in the UK:
 - A) We provide a secure and anonymous place for the public to report suspected online child sexual abuse images and videos and;
 - B) Use the latest technology to search the internet proactively for child sexual abuse images and videos.
- 2.3 The IWF has a [Memorandum of Understanding](#) between the National Police Chiefs' Council (NPCC) and Crown Prosecution Service (CPS) that governs our operations. This ensures immunity from prosecution for our analysts and recognises our role as the "appropriate authority" for the issuing of Notice and Takedown in the UK. Operationally, the IWF is independent of UK government and law enforcement.
- 2.4 The IWF also plays a vital role in providing the internet industry with several quality-assured technical services to prevent the spread of known child sexual abuse images and videos online and to stop the uploading of new images in the first place. These include image hashing utilising Microsoft's PhotoDNA, a URL blocking list of live webpages, keywords list, domain alerts, payment brand alerts, newsgroup alerts and simultaneous alerts (for US companies only). Key to this is our trusted relationship with the internet industry which enables us to act as a broker between them and government and law enforcement.
- 2.5 Our work is funded almost entirely by the internet industry: 90% of our funding comes from our 152 global Members which include Internet Service Providers (ISPs), search engines, Mobile Network Operators and manufacturers (MNOs), social media platforms, content service providers, telecommunications companies, software providers and those that join the IWF for CSR reasons.
- 2.6 Our Members include some of the biggest companies in the world – Amazon, Apple, Google, Facebook, Microsoft – as well as the largest ISPs and mobile operators in the UK, and also includes some of the smaller operators within the internet ecosystem who pay as little as £1,040 per annum yet still access everything we have to offer.
- 2.7 The remaining 10% of our funding comes directly from the European Commission's Connecting Europe Facility for our role within the UK Safer Internet Centre, providing a Hotline resource for the UK.
- 2.8 The IWF is a charity registered in England & Wales with an 11-person Board of Trustees of which, eight are independent members and three are industry representatives. The IWF Hotline is audited by an independent team, led by a judge, every two years and the report published in full.

3. Summary-

- 3.1 The IWF has significant concerns about the impact the coronavirus outbreak could have on the protection of children. It is vitally important that whilst the Government is responding to the outbreak and the issues associated with the pandemic, that it considers the risks and dangers posed to children as they spend an increasing amount of their lives online.
- 3.2 The provision of good effective online safety advice to children, parents and their carers has never been more important. The IWF remains concerned that whilst we may not be seeing a significant increase in the amount of child sexual abuse being reported to us at present, all the indicators prior to the pandemic show that this is an issue which is significantly on the rise and the child protection sector is bracing itself for further increases in cases during the current pandemic and once restrictions are lifted. This could potentially occur as children return to school and opportunities for practitioners working with children such as teachers and social workers opportunities for interventions resume.
- 3.3 The IWF is grateful that Government, in particular the Home Office and law enforcement, recognise the crucial role that we play in sitting at the heart of the national response to combatting the proliferation of the indecent images of children and for designating our analysts as key workers throughout this crisis. The Board and Senior Leadership Team of the IWF remain committed to ensuring that we do all that we can to protect children during this crisis and we are grateful to have the opportunity to set out the key challenges and our response to those challenges on this important issue to the Home Affairs Select Committee.
- 3.4 This response details our concerns about the protection of children during this crisis, our response and our perception of the response of the technology industry.

4. Concerns about the Protection of Children-

- 4.1 The Internet Watch Foundation is extremely concerned about the threat posed to children during this pandemic. As schools have closed and children have been sent home, there is less opportunity for state intervention in the lives of the nation's most vulnerable children. We are particularly concerned that children at this time are at greater risk from sexual abuse both online and offline.
- 4.2 Estimates from the [National Crime Agency](#) suggests that as many as 300,000 people in the UK pose a threat to children, either through physical "contact" abuse or online.
- 4.3 We know that contact (physical) child sexual abuse is a crime which tends to be interfamilial and, in most cases, a child knows their abuser well and often that person is in a position of trust or authority with that child. During this period, the sexual abuse of children becomes much harder to identify as the natural opportunities that exist to check on a child's welfare through them attending school and other public sector settings, means the opportunities for state intervention and to safeguard at present are greatly reduced.
- 4.4 This is further supported by the fact that the National Crime Agency has reported a decrease in reports from professionals working with children, such as teachers and social workers, but stated reports from children themselves had remained stable in a press release¹ it issued on 04 April 2020.
- 4.5 The IWF is particularly concerned about the opportunities there are for online offences against children during this period. There is a perfect storm of events created by the fact that both children and those who seek to exploit and abuse them, have more time on their hands throughout this pandemic and can do so relatively easily through the easy access the internet affords them.

¹ <https://nationalcrimeagency.gov.uk/news/onlinesafetyathome>

- 4.6 In 2019, the Internet Watch Foundation acted on 132,700 webpages containing child sexual abuse material. Each one of these webpages can contain anything from one individual image to thousands of images. A third of the webpages we actioned in that period contained self-generated indecent images of children (38,424 webpages). Of those webpages, 95% of the imagery was of girls; and 76% of that imagery was of girls in the 11-13 age range. On average, our analysts that are actioning the removal of this content from the internet, will see self-generated child sexual abuse content 118 times each day.²
- 4.7 Over the first few months of 2020, we have been continuing to see an upward trend in the amount of self-generated child sexual abuse material. Prior to the Government-imposed lockdown, our analysts were finding that this content equated to almost 50% of the webpages they were actioning for removal.
- 4.8 The IWF believes this trend is a national crisis in our children's bedrooms and we have been working with the technology companies within our membership and the Home Office on creating a campaign to target young girls in the 11-13 age range of the dangers of sharing images of themselves online.
- 4.9 This campaign will also target parents to ensure they have an increased level of awareness of what is going on in their children's bedrooms and encourage them to have regular conversations with their children about their online safety, in order to address this important issue. This is particularly important during this current pandemic as online safety potentially won't be able to be delivered as effectively as it is in schools at present, should the current lockdown continue for a protracted amount of time.
- 4.10 We are very concerned that children, due to spending more time online, accessing learning resources provided to them by their schools and by communicating with friends via social media who they cannot see physically due to social distancing restrictions, that this problem could be further exacerbated.
- 4.11 The IWF also has concerns about the behaviour of offenders throughout this period. We are concerned that like children and young people, offenders are also spending increasing amounts of time online during this period, further increasing the risk to children. The Lucy Faithful Foundation, a charity that provides a confidential helpline for anyone with concerns about child sexual abuse announced in February, that 93,342 people contacted the UK Stop It Now! Helpline in 2019. A 119% increase on 2018's figures,³ further demonstrating that more and more people are seeking help, support and advice in relation to the crime of child sexual abuse.

5. Our response to Covid-19-

- 5.1 The IWF continues to offer a secure and anonymous place for the public to report suspected child sexual abuse images and videos. Our highly trained, dedicated analysts are also continuing to proactively seek this content wherever it is hosted in the world, during the current crisis. Our 33 reporting portals around the world, which also feed into the IWF's hotline in Cambridgeshire for analysis are also still open to receiving public reports.
- 5.2 The IWF analysts are viewed as an important and essential service in the eyes of Government and law enforcement and have been formally designated as key workers by the Home Office. The IWF's work is seen as crucially important in protecting children and young people from harm and through our work with industry, in protecting internet users from encountering child sexual abuse.
- 5.3 Like many other businesses, however, we have sought to ensure the health and safety of our staff and taken steps to protect them from the coronavirus whilst ensuring we can keep the hotline operational. Any staff that can work from home are doing so and have been since 18 March 2020. The hotline team has been split in half and is currently operating at half the capacity it usually does. This is to ensure that we can adhere to social distancing whilst at work and ensure there is

² IWF Annual Report 2019- (yet to be published).

³ <https://www.stopitnow.org.uk/home/media-centre/news/number-seeking-help-to-stop-viewing-sexual-images-of-children-doubles/>

sufficient resilience for the organisation should someone in one of those two teams contract the Coronavirus and others who they have come into contact with have to self-isolate.

- 5.4 It is important to recognise that the assessment of this type of content cannot be done from home and must be conducted at the IWF's premises as the content we deal with is illegal. The IWF's analysts are therefore continuing to come into work in order to carry out their duties, with the two teams attending on alternating days.
- 5.5 The only differences in the service the IWF provides, is that reports we receive from members of the public will take slightly longer to process, the IWF will not action quite as much content for removal as usual because we are operating at a reduced capacity and there is a risk of content remaining live for longer due to reduced capacity across the global network of hotlines, companies and law enforcement agencies.
- 5.6 The IWF is continuing to ensure the important services the internet industry rely on to ensure they can keep their services free from child sexual abuse and therefore protect their customers remain operational. The IWF operates a range of services to the industry. The main services include (others are also available):

Image Hash list- Utilising Microsoft's Photo DNA technology we can give a unique digital fingerprint to each individual image of child sexual abuse. Industry then deploys this hash in its filtering systems and gives them the ability to then prevent the upload of imagery we have determined to be illegal.

Keywords list- This is a list of known search terms that return child sexual abuse imagery. During the current crisis, the IWF has successfully increased the amount of terminology on this list by 4,000 keywords, greatly improving the response to searches for known child sexual abuse imagery.

URL list- Our URL list is a dynamic webpage blocking list. This list is used to ensure that where we have identified child sexual abuse imagery, that we are waiting to be removed at source, mainly located outside the UK, can be deployed by Internet Service Providers and filterers to ensure that their users do not accidentally stumble across known child sexual abuse imagery. UK based internet service providers provide a splash page to anyone attempting to access a URL on this list and direct them towards the Lucy Faithful Foundation to seek help or advice should they be concerned about their behaviour.

- 5.7 The URL list is of particular importance during this crisis. The IWF is beginning to see content we are actioning for removal remaining live for longer. This is due to several reasons:
- Other hotlines and law enforcement agencies like the IWF working globally are also working at a reduced capacity and many of these hotlines already have a smaller resource in normal times in comparison to the IWF, putting them under significant pressure.
 - Some European hotlines have closed altogether for a period of time (France, Spain, Croatia and others)
 - The companies themselves that receive Notice and Takedown notifications from hotlines are potentially taking longer to respond, as they are in the similar position of having reduced resources.
- 5.8 The IWF's URL list is checked daily by our analysts, new content is added each day and URLs that have then been successfully taken down and no longer contain child sexual abuse, are removed from the list. During the current crisis, the IWF's list of URLs has remained static around 5,700 URLs.
- 5.9 The URL list usually ranges from 5,000-10,000 URLs when operating in normal times, with a daily churn rate (URLs being removed and added) of anywhere between 200 and 500 URLs. The current rate of churn in this crisis has been 20 to 30 URLs per day, but this lower than usual churn rate can be explained by the fact that IWF, other hotlines, law enforcement and industry are all facing similar challenges when it comes to resourcing their response to this issue and observing

the relevant social distancing and health and safety measures for their staff during the current crisis.

- 5.10 The IWF is still encouraging members of the public to play an important role in this crisis when it comes to identifying child sexual abuse online. We will continue to encourage the public to report their concerns to us, however, at this important time it is absolutely crucial that the public accurately report their suspicions to us and do not send erroneous reports that are off remit for us, or plainly not child sexual abuse material. It is always vital that our analysts' time is used effectively, but even more important during this current crisis.

6. The response of the technology industry-

- 6.1 Finally, the IWF is pleased to report that the internet companies within the membership of the IWF continue to take the spread of child sexual abuse seriously and are committed to helping us achieve our charitable objective of an internet free of child sexual abuse material.
- 6.2 Our members are continuing to regularly download the services that we share with them that are relevant to their products and services they offer their customers to safeguard their users from child sexual abuse in line with the license requirements for each service.
- 6.3 The discussions we have had with some of our members has seen them continue to prioritise the issue, with many relying increasingly on artificial intelligence and automation to remove this content from their platforms. They are also using the similar processes to prevent the upload of known content to their platforms or preventing the viewing of this imagery through the services that we provide.
- 6.4 The companies, however, are also experiencing challenges when dealing with this content. As the IWF has mentioned in this submission, the assessment of this content can only be carried out with the appropriate procedures in place and it is not acceptable for the moderation of this content to be conducted remotely. The same rules and procedures for moderators in companies must apply as they do to our analysts.
- 6.5 The internet companies have therefore had to take similar measures to the IWF to adhere to the health and safety of their workers and their moderators are also operating at a reduced capacity. This has meant that companies are increasingly reliant on automation to moderate their platforms but could mean that more complex cases of child sexual abuse including grooming, may remain live for longer as the human review function may be significantly reduced.

7. Conclusion

- 7.1 In conclusion, the Internet Watch Foundation remains open to receiving reports of child sexual abuse material online from members of the public. We are encouraging them to accurately report content and we continue to seek the swift and effective removal of this content wherever it is hosted in the world.
- 7.2 We remain committed to the protection of children throughout this period and to our charitable objective of an internet free from child sexual abuse. We hope this briefing is of interest to the Committee and the IWF would welcome the opportunity of briefing you further on this important issue.

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