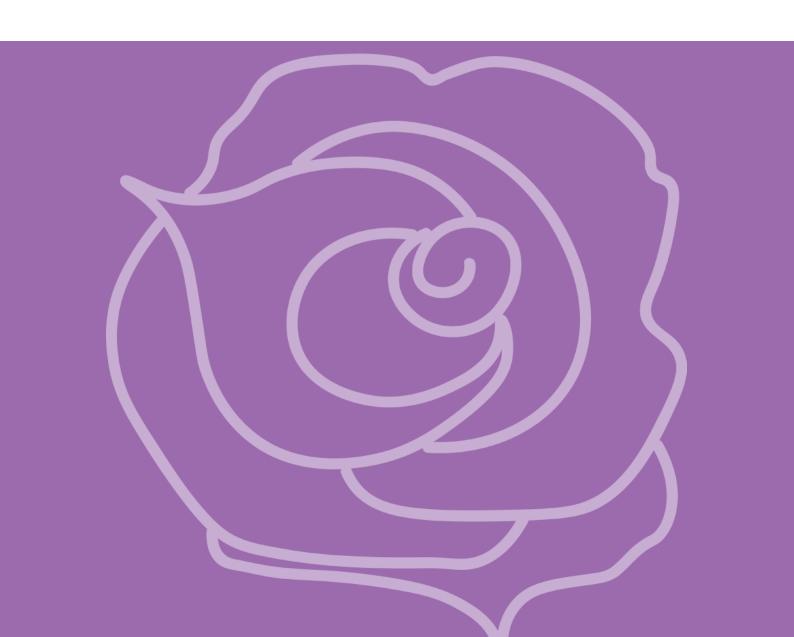


Further and faster

Public and parental views on and support for a new Online Safety Act

October 2024



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Summary

October 2024 marks one year since the Online Safety Act was granted Royal Assent.

More than five years in the making,¹ online safety regulation will be judged by whether it delivers a single overarching objective: tackling inherently preventable online harm, including harms directly facilitated by how online services are designed and run.

In the last year, we have come to understand much more about the Online Safety Act (OSA) regime and its likely effectiveness. The regulator, Ofcom, has set out its draft regulatory schemes to tackle illegal content and protect children from harmful material.

In our assessment, Ofcom's proposals contain some important and welcome measures, but ultimately lack much needed ambition. While the Online Safety Act remains the most effective route to keep children safe from harm, Ofcom's regulatory schemes do not appear commensurate to the scale and nature of the threat posed by suicide and self-harm content.

Much of our concerns stem from the choices made by Ofcom in its implementation of the Act, and starkly underline structural weaknesses in the statutory framework. In our assessment, this means a new Online Safety Act must now be urgently brought forward.

A second Act can ensure the regulator has a clear and unambiguous duty to achieve measurable, sustained harm reduction – and ensure children and young people get the higher standard of protection that they deserve, and the Act committed to deliver.

As broader attention turns to 'what's next?', this report sets out to explore the views and attitudes of over 4,200 adults across Britain, including a sample of 895 parents. Our results show strong support for the Online Safety Act, but also substantial support for politicians and regulators to move quickly to further strengthen the regime.

Our results show:

- Significant levels of public concern about the scale and impacts of online harm on children: more than nine in ten parents are concerned about the relationship between social media and mental health (92 per cent), and by the algorithmic recommendation of suicide and self-harm content (91 per cent).
- Strong support for a second Online Safety Act: four in five adults (80 per cent), and 84 per cent of parents, support a new Act that can strengthen regulatory protections for children. Among those who support further regulation, nine in ten (89 per cent) want this to be introduced no later than the second year of the Parliament.

¹ Digital Secretary Matt Hancock first announced an Online Safety Bill would be introduced on 19th May 2018



- A clear sense that governments and platforms have failed to do enough to tackle safety risks: Over four in five parents feel that both online platforms (84 per cent) and politicians (82 per cent) should be doing more to protect young people. More than three quarters (77 per cent) think governments been too slow to act in regulating social media.
- A palpable lack of support for some of the key principles that inform Ofcom's approach to regulation: For example, over four in five adults (81 per cent) hold the view that safety should be mandated even if this results in significant additional costs to companies (Ofcom's approach is focussed on economic proportionality); 70 per cent would support a precautionary principle approach being applied (this would require firms to act on harms even if the evidence is still to be proven); and three-quarters (74 per cent) of adults take the view that tech companies should be expected to go above and beyond the minimum standards set out by a regulator (at present, a company is considered to be complying with the regulation if it meets the measures set out in Ofcom's codes.) This suggests that, even when implemented, the current regulatory framework is likely to considerably fall short of public expectations.
- Substantial support for a broader regulatory settlement, including new powers and funding for civil society and independent researchers: four in five adults (79 per cent) would support regulatory fines being redirected to online safety causes (these currently go directly to the Treasury.) A clear majority of parents (72 per cent) would support a levy on social media companies to fund online safety initiatives, and two-thirds (68 per cent) would support a mandatory right for researchers to request anonymised data from regulated firms, including access to algorithms.

The new Secretary of State has already signalled his willingness to go further, stating there is 'more to do' on online safety, and that he is committed to 'ensure the Act is delivering the protections it promised and building on it when necessary.' ²

Our results suggest that the public want and expect the Online Safety Act framework to be strengthened, with significant questions about whether the existing regulatory approach can respond to the strength of public and parental concern about preventable online harms.

This research sets out a clear message to politicians and regulators - it's time to strengthen the Online Safety Act, and to finish the job.

Methodology

YouGov surveyed 4,263 adults in July 2024. This includes a sample of 895 parents with at least one child aged younger than aged 18. Fieldwork was carried out online. The figures have been weighted and are representative of all GB adults (aged 18+)

2 Speaking to The Times on 15th July



Findings

1. A new Online Safety Act attracts strong public and parental support

Our findings show there is strong support for the Government to introduce a new Online Safety Act that can strengthen and build upon the current statutory framework – with the vast majority of adults and parents wanting to see new legislation introduced in the first half of this Parliament.

Four in five UK adults (80 per cent) would support a new Online Safety Act being introduced that would increase regulation of social media platforms for young people. Support rises to 84% of parents with at least one child under 18.

Among those who support a second Online Safety Act, there is a strong consensus that this should be introduced quickly. Nine in ten (89 per cent of adults) think this should be introduced within the first two years of the Parliament, including 91 per cent of parents with a child aged under 18. More than three in five (63 per cent) of adults, and two thirds of parents (67 per cent), want to see a new Online Safety Act introduced in the Parliament's first year.

Although Labour had previously pledged to strengthen the Online Safety Act in opposition,³ no legislative plans were announced in July's King's Speech.

It appears that the substantial public support for further online safety legislation is driven by high levels of public concern about the risks that social media poses to children's safety and well-being, as well as clear sentiment that governments and tech companies have been slow to address preventable online harms.

As figure 1 shows, only one in ten UK adults feel that politicians are doing everything they reasonably can to address the online safety of young people. Just 7 per cent of parents feel that enough has been done.

Perhaps unsurprisingly, most adults and parents feel that the previous Government was too slow in regulating online services. 73 per cent of adults (rising to 77 per cent parents) feel that the government was too slow to regulate social media, while only 6 per cent think the government got the balance about right.

³ In January 2023, Labour committed to legislate to strengthen what it described as a 'weakened and gutted' Online Safety Bill in an interview with The Observer. The newspaper reported this would be 'one of the first acts of a Labour government.'



Figure 1: Are online platforms and politicians doing enough to address online safety of under 18s?

	Adults	Parents with a child aged under 18			
Online platforms					
Doing everything they reasonably can	7%	7%			
Should be doing more	81%	84%			
Don't know	12%	9%			
Politicians					
Doing everything they reasonably can	10%	7%			
Should be doing more	77%	82%			
Don't know	13%	11%			

Base: 4,263 adults, 895 parents with a child aged under 18

Demand for stronger social media regulation is driven by very high levels of public concern about the potential impacts of social media on the mental health and well-being of young people. As figure 2 shows, over nine in ten parents (92 per cent) are concerned about the relationship between social media and young people's mental health.

Similar proportions are concerned about the role that social media algorithms play in recommending harmful content. More than nine in ten parents (91 per cent of parents) are concerned about young people being recommended suicide and self-harm content by social media algorithms, and 89 per cent are worried about algorithmic recommendation of eating disorder content.

Only slightly fewer parents (87 per cent) are worried about young people being algorithmically recommended depression content.

It is striking that the proportion of parents and UK adults who state they are very or somewhat concerned about the impacts of social media and algorithmic recommendations is near identical. This suggests that the risks associated with algorithmic recommendation of harmful content is seen as a pronounced societal issue, not simply one that concerns parents thinking about the risks to their own child.

This underscores the extent to which online safety has become a deeply rooted lived and political issue. Given this, it is perhaps unsurprising that there is such overwhelming support for the Government to take further action to bolster the regulatory regime.



Figure 2: How concerned are parents about social media and mental health effects?

	Very concerned	Somewhat concerned	Total Concerned	Not very concerned	Not at all concerned	Total non- concerned
Relationship between social media and young people's mental heath	66%	26%	92%	4%	1%	5%
Young people algorithmically recommended suicide and self-harm content	72%	19%	91%	4%	2%	6%
Young people being algorithmically recommended eating disorder content	63%	26%	89%	6%	2%	8%
Young people being algorithmically recommended depression content	57%	30%	87%	7%	2%	9%

Base: 895 parents with at least once child younger than aged 18. DKs not shown on the table.

2. A new harm reduction duty should underpin the regulatory framework

Our results show significant support for a strengthened Online Safety Act that actively prioritises measurable improvements in harm reduction.

A clear majority of UK adults (74 per cent) would support the introduction of a new harm reduction duty on the regulator. MRF envisages that under a harm reduction duty Ofcom would be expected to set annual targets for reducing exposure to and prevalence of online harms.

Four-fifths of the public (79 per cent) would support the regulator being made to write to the Government if it fails to achieve its targets. This measure – broadly analogous to the requirement on the Bank of England to write setting out why its inflation targets have been missed – could be a powerful tool that would refocus the regulatory regime on a central regulatory objective, measurable harm reduction.

Crucially, this would help to ensure that continuous risk reduction is the unambiguous North Star for Ofcom's regulatory approach.



Figure 3: support for a harm reduction duty

	A legal duty for the regulator to set annual targets for harm reduction	Should it fail to achieve annual improvements in harm reduction, a requirement to write an explanation to the Government
Strongly support	47%	51%
Tend to support	27%	28%
Total support	74%	79%
Neither support nor oppose	12%	10%
Tend to oppose	3%	2%
Strongly oppose	1%	1%
Total oppose	4%	3%

Base: 4,263 adults. DKs not shown in the table

Our results suggest strong public support for the 'polluter pays' principle, with 83 per cent of parents agreeing that tech companies who fail to prevent online harms on their platforms should be required to pay for the costs of addressing them.

Similarly, more than four in five parents and adults (81 per cent) think that tech companies should ensure their services are safe for young people, even if this results in substantially higher costs being incurred by them.

As it stands, Ofcom is required by the statutory framework to ensure its regulatory approach is introduced on a proportionate basis. In respect of both Ofcom's illegal content and child safety draft regulatory schemes, MRF has raised concerns that Ofcom consistently appears to be showing more regard to the costs of imposing online safety measures on regulated firms than on the social and economic benefits of reducing harms.

In a number of other areas, our results also point to a disconnect between some of the principles underpinning Ofcom's approach and public expectations of regulatory design.

Our results show that seven in ten adults (70 per cent), and three quarters (75 per cent) of parents, believe the regulator should require tech firms to address potential harm at the first possible opportunity, rather than waiting before definitive evidence of harm is proven (in effect, the adoption a precautionary principle approach). Ofcom has to date failed to adopt a precautionary approach, despite this being a widely adopted regulatory approach since the 1990s.⁴

⁴ For example, the UK Government recommended the precautionary principle as a regulatory approach as early as 2002, with its general presumption that the burden of proof 'shifts away from the regulator having to demonstrate the potential for harm towards the hazard creator having to demonstrate an acceptable level of safety. Interdepartmental Liaison Group on Risk Assessment (2002) The Precautionary Principle: Policy and Application. London: HM Government



The regulator has chosen to apply exceptionally high evidentiary thresholds before it will determine that it is proportionate to recommend safety measures as part of its codes. This has had the effect of rendering Ofcom's draft Codes as highly reactive, and in our assessment, troublingly unambitious. Again, this approach appears to be out of step with public expectations about what the OSA should achieve.

Three quarters of adults (74 per cent) believe tech companies ensure their services are safe for young people above and beyond the guidance set out by the regulator. Only one in six (16 per cent) adults think that the measures set out by the regulator should represent a set of minimum standards.

As it stands, social media platforms are able to receive a 'safe harbour' if they comply with the provisions set out in Ofcom's Codes. This urgently needs to change. Ofcom is encountering distinct structural and evidential barriers that are preventing its codes from being as strong as are necessary to disrupt the scale and complexity of many harms. As it stands, some large platforms could scale back their existing safety approaches and still legitimately be able to claim compliance with their requirements. This is an outcome that is clearly contrary to the aims of Parliament when it passed the legislation.

3. A Duty of Candour and a new transparency regime for regulated firms

In addition to new duties on the regulator, there is a significant public support for a set of new regulatory duties to be imposed on regulated firms – and for a significant reset of the transparency and information disclosure expectations on companies.

More than four in five UK adults (84 per cent) would support a new legal 'Duty of Candour' being imposed on tech firms: this would require them to be proactive and open with the regulator where new online harms emerge or they make changes to their platform that might reasonably affect product safety.

Similarly, an overwhelming majority of adults (90 per cent) would support a new duty to notify the regulator if they experience a serious safety breach.

As it stands, while Ofcom has a comprehensive set of transparency and information disclosure powers at its disposal, it is beholden on them to ask the right questions – rather than, as is the case in other sectors such as financial services, for regulated entities to have a duty to proactively notify the regulator of things which they should reasonably be expected to be made aware.

MRF attaches significant value to a Duty of Candour being extended to cover tech firms.

The Government has announced that it will bring forward a Duty of Candour to cover public bodies ('the Hillsborough Law') by April 2025. We believe that a similar duty that prevents tech companies from being able to frustrate, delay or not disclose information to public bodies, in this case the regulator (but that could also apply in other settings such as coroner's courts), would be hugely effective in delivering stronger online safety outcomes.



This could also ensure that systemic lessons, including from cases that involve the death of a child, could be identified and evaluated more quickly. This in turn would speed up Ofcom's ability to identify and act on necessary revisions to its codes.

A strong majority of adults (81 per cent) support additional transparency requirements being placed on tech firms, in the form of a duty to report on young people's exposure to online harms in their corporate accounts.

While the statutory framework is currently exclusively focused on transparency requirements that are overseen by the regulator, there is considerable merit in exploring how transparency provisions could be usefully expanded to other settings, in this case corporate accounts that are likely to be viewed by corporate and institutional investors.

Transparency is increasingly emerging as a primary means to drive awareness of the risks faced by children and young people when using online services – but there is limited awareness and exposure of online safety risks among clearly influential groups, including corporate ad buyers, pensions funds and corporate and institutional investors.

Lessons from other sectors, not least the response to tackling climate change, demonstrates the hugely beneficial role that mandatory transparency can play in refocussing corporate and investment decisions.

MRF believes that that a set of reporting requirements, large mirroring the UK and G20 model of reporting exposure to climate change risks, ⁵ could effectively compliment regulatory routes, and could also help to catalyse significant shifts in commercial and investment decisions, including the potential to pump prime an online safety-focused impact investment model.⁶

4. A stronger approach to content that is harmful to children's mental health and wellbeing

Our polling finds strong support for Ofcom to take a more assertive approach to tackling the risks of teenagers being recommend harmful material, including through recommender algorithms. As it stands, Molly Rose Foundation has substantial concerns about the likely effectiveness of the regulator's proposed approach.

Under its current iteration, the statutory framework sets out a two-fold approach to protecting children from harmful or inappropriate content: certain forms of the most harmful categories of content, including material that promotes or glorifies suicide and self-harm, are classified as Primary Priority Content – meaning that platforms should prevent child users from viewing or being algorithmically recommended it.

⁶ Other lessons from financial services regulation could also be applied, for example the potential to identify safe-by-design services to investors drawing on the approach adopted by the PS23/16 Sustainability Disclosure Requirements



⁵ The UK has led the G20 in implementing climate-related financial disclosure measures (TFCD) disclosures. In March 2024, the US Securities and Exchange Commission followed suit with enhanced climate-change exposure and risk management disclosures.

In respect of other forms of content, including challenges and stunts that have been linked to the deaths of multiple UK teens, the Act requires platforms to prevent children encountering it by means of the service. Ofcom has interpreted this to mean that platforms may continue to algorithmically recommend this to children, but must do so in lower amounts.

A strong proportion of parents and adults disagree with this approach and think that a much stronger regulatory approach is required.

Our findings show that seven in ten adults (69 per cent), and three quarters (75 per cent) of parents, believe young people should not be algorithmically recommended nor able to view harmful suicide and self-harm content. Under Ofcom's proposals, platforms will need to prevent this content being algorithmically recommended, but only where this is previously identified through content moderation processes.

Our research suggests that a substantial amount of relevant harmful content currently goes undetected (with the highest so-called 'leakage rates' on platforms including Instagram, Facebook, Snapchat and X.) Collectively, these four platforms report only 3 in every 100 items of suicide and self-harm content detected by industry as a whole.⁷

More than half of adults (and 53 per cent of parents) think children and young people should be unable to view challenges or stunts where there is a risk of serious injury and death. A further third of parents (32 per cent) think this should not be algorithmically recommended at all.

Meanwhile, more than three quarters of parents (77 per cent) think that teens should either be prevented from accessing or being algorithmically recommended depression-related content. 85 per cent think similarly about eating disorder content.

As figure 4 sets out, this means there is a substantial disconnect between public expectations of regulatory outcomes and the likely results of Ofcom's scheme. The regulator itself has likely fuelled this problem by making overly ambitious public statements – such as its claims that its proposals will 'tame toxic algorithms' – which in the short term are likely to be well received, but in the longer-term may fuel disappointment when much more modest and insufficient outcomes result.

MRF sees a compelling argument for the Government to look again at its approach to harmful content, including the approach to and designation of Primary Priority and Priority Content.

As our polling suggests, the strength of public concern about the risks of harmful content is palpable. As it stands, the legislative framework will mitigate but may insufficiently reduce the risks that young people continued to be recommended or able to discover harmful content, including through personalised algorithms, search suggestions and other search and recommendation design features.

⁸ Ofcom's press release at the launch of its consultation on its Protection of Children regulatory scheme



⁷ Molly Rose Foundation (2024) How effectively do social networks moderate suicide and self-harm content? An analysis of the Digital Services Act Transparency Database

Figure 4: Preferred regulatory responses to harmful content among parents of children aged under 18 (Ofcom's proposed approach in purple)

	Social media platforms should be able to freely recommend this content to young people	Social media platforms should be able to recommend this content to young people, but less frequently	Social networks should not recommend this content to young people, but the user can still search for it	Social networks should not recommend or allow this users to see this content at all	Don't know
Suicide and self- harm content	2%	2%	15%	75%	7%
Challenges / stunts that risk serious injury or death	2%	6%	32%	53%	8%
Eating disorder content	2%	4%	30%	55%	8%
Depression related content	4%	9%	44%	33%	10%

Base: 895 parents with at least one child aged under 18. Ofcom's proposed response reflects the draft position relating to relevant content that is considered harmful by the definitions applied in the Act and/or Ofcom's interpretation of it.

5. Empowering civil society and independent researchers to hold tech companies to account

Our results show strong support for civil society, academics and lived experience networks to play a full and comprehensive role in informing online safety regulation, with a clear majority of adults and parents supporting action to unlock funding for civil society and academic research, alongside a new statutory right for independent researchers to access company data.

At it stands, tech companies are required to pay an industry levy that covers the costs of Ofcom's regulatory scheme. However, unlike most other regulatory regimes such as water, energy or post, the levy does not extend to cover the work of civil society groups, nor does it extend to cover independent research.

Our polling suggests that majority of parents and the public want additional funding for civil society advocacy and academic research. Over seven in ten parents (72 per cent) support an industry levy to support the of online safety groups, while two-thirds (66 per cent) support a levy to support academic research into online harms.



There is also strong support for financial penalties imposed by the regulator to be channelled into online safety activities, potentially providing a new 'polluter pays' income model to support the work of online safety civil society groups, prevention and education initiatives. Over four in five parents (83 per cent), and 79 per cent of adults, support regulatory fines being redirected to cover online safety measures, which at present are returned to the Exchequer.⁹

Despite calls from civil society and academic groups, the Online Safety Act failed to include measures to grant access to anonymised data sets from tech firms. Barriers to data sets have been a substantial impediment to developing the research base into online harms, and have created an opportunity for tech firms to skew the evidence base by granting selective access to datasets to sympathetic researchers.¹⁰

A majority of adults and parents want this situation to change, and in effect, for UK researchers to be granted the same rights as afforded to EU researchers under Article 40 of the Digital Services Act.

Two-thirds (68 per cent) of parents, and 61 per cent of adults, support researchers having a legal right to access anonymized data and algorithms from social media companies for the purpose of researching online harms.

A clear majority of adults and parents would support the regulator formally consulting victims of online harms and bereaved parents on the regulator's proposals. Among those who expressed a view, 82 per cent of parents believe this would make regulation better. Four in five adults (79 per cent) agree.

Earlier this year, a group of 20 bereaved parents and lived experience campaigners wrote to Ofcom stating that they felt 'excluded' from Ofcom's consultation processes. ¹¹ While discussions with the regulator continue, a satisfactory voluntary model is still to be agreed.

¹¹ The Observer (2024) Ofcom accused of 'excluding' bereaved parents from online safety consultation. 5th May 2024



⁹ In other regulatory schemes, regulators have sought to address this issue by developing alternative penalty schemes, which see regulated firms agree to fund prevention and/or vulnerable user support schemes in lieu of fines

¹⁰ Abdalla, M et al (2021) The Grey Hoodie project: Big Tobacco, Big Tech, and the Threat on Academic Integrity. University of Toronto and Harvard Medical School

Recommendations

Our polling shows clear and overwhelming support for a new Online Safety Act that can strengthen the existing regulatory regime and is commensurate to the scale of the risks to young people.

Online safety regulation remains the single most effective route to deliver systemic change. However, it is increasingly clear that there are systemic issues with the existing Act – and that these risk constraining Ofcom's ambition and risk appetite to respond effectively to the growing scale and complexity of online harms.

MRF believes that the Government should respond to the strength of public concern by moving swiftly to strengthen the regulatory regime and to act on these calls.

It is clear that parents and adults want to see further sustained action to ensure safer online outcomes for children – with a clear sense that politicians have so far failed to move quickly and ambitiously enough to disrupt and reduce preventable online harms.

Crucially, our polling suggests that public expectations of the Act are unlikely to be met by Ofcom's current approach – and may be undeliverable unless the Government commits to fix structural issues with the statutory framework. These structural issues will not fade as the regime starts to take effect, and in all likelihood will only become more pronounced.

Earlier this year, MRF set out a series of measures that the Government can take to substantially bolster the regulatory regime – and to demonstrate to parents that it is committed to swift but effective further action.

A new Online Safety Act should:

- Reassert an overarching Duty of Care: under the current Act, tech companies benefit from a 'safe harbour' if they follow the set of recommended measures in Ofcom's codes. However, there are distinct structural and evidential barriers that are preventing Ofcom drafting sufficiently ambitious and up-to-date codes, and this means some large firms could scale back their existing safety efforts while still legitimately claiming compliance.
- Anchor the regime around measurable harm reduction: Ofcom should be subject to an overarching duty to deliver annual improvements in harm reduction, with this clear and unambiguous duty re-centring the regime and adding much needed urgency and ambition to Ofcom's approach. Drawing on the requirements placed upon the Bank of England if its inflation targets are missed, the regulator should be required to write to the Government setting out if it misses its harm reduction targets, and setting out what further action it will take.
- Re-set the transparency and information disclosure duties on regulated firms: a proactive Duty of Candour should be imposed on tech firms, which can shift the power dynamic from regulators having to ask the right questions to companies being liable if they fail to disclose to the regulator information that is material to the risk of reasonably foreseeable harm. A similar measure already exists in financial services. A provision to not frustrate, impede or delay the work of public



bodies should also be included, and should also extend to coronial proceedings, bolstering the Government's previously announced commitments on data rights for bereaved parents.

Extend the industry levy to cover online safety advocacy, research and prevention initiatives, and ensure any right for researchers to access Big Tech datasets is meaningful: The industry levy which currently funds Ofcom must be extended to cover civil society and academic activity, with any fines imposed on regulated firms being redirected to support prevention, advocacy, education and research initiatives. Put simply, this a prerequisite if we are to meaningfully address the informational asymmetry between civil society, academia and regulated firms.

We strongly welcome the commitment to introduce a statutory right for independent researchers to access Big Tech datasets, which we anticipate being brought forward in the Data Bill. Academic and civil society researchers must be legally able to request anonymized data to understand the design choices made by tech firms, and to demonstrate the cause mechanics of technology-facilitated harm. The Bill's provisions will need to enacted in a way that ensures academics and civil society researchers can use these powers meaningfully, without frustration or obfuscation from tech firms.

Establish new corporate accountancy standards that require tech firms to report on their exposure to online harms: as a standard part of financial reporting requirements, companies regulated under the Online Safety Act should be made to report on users' exposure to online harms on their services. Other companies could report on steps they have taken to reduce the risks of indirectly contributing to online harms.

These measures are broadly analogous to the incoming requirements on corporate entities to report on exposure to climate change -related risks, now being implemented by the G20 – and are of course auditable. As well as taking a head start on these new accountancy measures, the UK should push for a new global standard to be through its leading role as a member of the G7.

Seven years after Molly's death, these meaningful and important changes to the Online Safety Act can reset the regulatory regime - and provide parents, civil society and the wider public with the confidence and reassurance that tangible change is on the way.

It is more important than ever that minsters commit to credible, evidence-based strategies to deliver a step-change in children's online safety – and focus on proven approaches that can deliver tangible improvements to the safety and wellbeing of our young people.

This isn't the time for slow, piecemeal or sticking plaster approaches, nor for a kneejerk shift towards bans or restrictions. While firms continue to move fast and break things, timid regulation could cost lives.

That's why it's time for the Government to now finish the job.





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