

Rt Hon Sir Keir Starmer QC MP

The Prime Minister
10 Downing Street
London
SW1A 2AA

22 January 2025

Dear Prime Minister,

I am writing to you on behalf of the [Internet Watch Foundation](#) (IWF), the official UK hotline for assessing and removing child sexual abuse material (CSAM) from the internet. We are extremely concerned by the increase in child sexual abuse imagery we are seeing and urge you to take swift steps to strengthen online safety regulation.

As we mark the ten-year anniversary of our Memorandum of Understanding, I want to take this opportunity to reflect on the pivotal role you have played in the fight against online child sexual abuse. During your tenure as Director of Public Prosecutions in 2014, you took the bold step of empowering the IWF to proactively identify and remove CSAM online. Your decision to act decisively a decade ago has had a profound and lasting impact on the safety of children across the UK and beyond.

The Memorandum of Understanding you helped establish has allowed us to hunt down CSAM in ways that had never been done before. As a result, millions of abusive images and videos have been removed from the internet, providing critical relief to victims and survivors who suffer the ongoing trauma of having their abuse circulated.

Today, we are asking you to act decisively again to ensure the safety of children online. Despite our collective efforts, a tidal wave of online abuse is now towering above us. In 2024, the IWF acted to remove 291,270 webpages containing images or videos of children suffering sexual abuse or links to that content. This is the highest number of child sexual abuse webpages the IWF has ever discovered in its 29-year history and is a five per cent increase on the 275,650 webpages identified in 2023.

We firmly believe that the Online Safety Act has the potential to be transformational in protecting children from online exploitation. In December 2024, Ofcom published its first codes of practice and guidance on tackling illegal harms under the Act. For the first time, platforms will be legally required to scan for known child sexual abuse imagery, such as through hash matching, and the IWF stands ready to support platforms to meet this obligation.

However, we are deeply concerned that the Codes allow services to remove illegal content only when it is 'technically feasible', which will incentivise platforms to avoid finding ways to remove illegal content in order to evade compliance. This undermines the Act's effectiveness in combatting online child sexual abuse. We urge you to instruct Ofcom to urgently review and mitigate this blatant get-out clause.

The publication of the Codes also highlights the weaknesses within the legislation itself. For example, the Act does not mandate companies to moderate content uploaded in private communications. As a result, illegal content that is blocked elsewhere on the internet can still be freely shared in private online spaces.

Furthermore, the rules-based nature of the regulations means that platforms will be in compliance with their duties if they follow the measures in the Codes, rather than needing to effectively and proactively address the harms identified in their risk assessments.

We call on your Government to remove the safe harbour inadvertently offered to platforms by the Act, especially those that facilitate the sharing of child sexual abuse material. Additional legislation should be introduced to ensure there are no safe havens for criminals in private communications.

The rise in the child sexual abuse imagery that the IWF is seeing on a regular basis leaves us with no doubt that further action is needed now. We cannot afford to wait another decade for further decisive action.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'C. Brown', with a long horizontal flourish extending to the right.

Catherine Brown

IWF Chair of Trustees