

# CARE response to Ofcom Consultation: Protecting people from illegal harms online

## Introduction to CARE

1. CARE (Christian Action Research and Education) is a well-established mainstream Christian charity providing resources and helping to bring Christian insight and experience to matters of public policy and practical caring initiatives. CARE advised MPs and Peers during the passage of the Online Safety Act through Parliament and played a similar role during the debates on Part 3 of the Digital Economy Act 2017. CARE is particularly concerned with the impacts of pornography on children and adults. We have campaigned on the need to protect children from accessing pornographic content as well as the impact on violence against women and children caused by addiction to extreme pornographic content.
2. This submission is not confidential. It is submitted alongside our support for the response submitted by the Online Safety Act Network document 'Ofcom Illegal Harms Consultation: Emerging Concerns'<sup>1</sup> and the full response to the consultation and codes of practice submitted by the same group.
3. It is important to note from the outset that the size, scope and scale of the consultation document has been a barrier for many organisations in fully engaging in a meaningful way. As a small charity with resource constraints, CARE has been unable to engage as fully as we would have liked. We understand this has been the experience of many other charities that also campaigned during the passage of the Act through Parliament.
4. While CARE is concerned with illegal harms in general and are fully supportive of the Online Safety Act's intention to tackle several online harms, due to the scale of the consultation and our limited resources, we have confined our comments to three areas of online harm identified in the consultation, namely: child sexual exploitation and abuse, sexual exploitation of adults, and extreme pornography. The issue of pornography and sexual exploitation has been a core campaign concern of CARE for many years. As stated in paragraph 2 above, we support the document submitted by the Online Safety Act Network; our comments are intended to further amplify the harms of pornography and are to be read in addition to the work of the Online safety Act Network response.

---

<sup>1</sup> Online Safety Network ['Ofcom Illegal Harms Consultation: Emerging Concerns'](#) February 2024

## Volume 2 – The Causes and Impacts of Illegal Harm.

**Question 1: Do you have any comments on Ofcom’s assessment of the causes and impacts of online harms? Do you think we have missed anything important in our analysis? Please provide evidence to support your answer.**

**Question 2: Do you have any views about our interpretation of the links between risk factors and different kinds of illegal harm? Please provide evidence to support your answer.**

### **Child Sexual exploitation and Abuse – grooming and Child Sexual Abuse Material (CSAM)**

5. As noted in the consultation, grooming is increasing. A recent report by the National Crime Agency found that the largest criminal group in the UK are people who abuse children; it is estimated that 1.5% of the UK adult population pose a serious risk to kids.<sup>2</sup> While the consultation document notes all the main ways that children are at risk, it is clear that persons wishing to contact children for sexual exploitation are becoming more creative and deceptive. While social media and gaming sites such as Roblox, with chat functions are commonly used, apps and content with no direct or indirect chat facility have also been used to target children. In 2023 an 11-year-old was allegedly targeted through a Spotify playlist.<sup>3</sup>
6. We are concerned that the consultation document does not directly address end-to-end encryption and the particular risk associated with apps that utilise this technology. Content shared by end-to-end encryption potentially poses a threat to children. Any end-to-end encrypted communication, without child safety protection measures included in the design, will result in an unsafe environment. It is concerning that over 90% of CSAM is now self-generated by children themselves,<sup>4</sup> with much of this content being shared by the child over well-known social media messenger functions. Many of those messaging apps are set to include end-to end encryption, without the necessary child safety tools.<sup>5</sup> Social media messaging sites are now believed to be the primary platform for the distribution of self-generated CSAM.<sup>6</sup> Since, the origin of many of these images is due to an adult grooming the child, and encouraging the child to send self-generated images, this issue needs to be addressed more clearly in the causes and impacts of illegal material in volume 2 of the consultation document.
7. The issue of grooming and the sharing of self-generated images is particularly concerning as many children do not appreciate that the sending of illegal material is a risk, and a criminal offence. A 2021 study in Sweden found that half of the teenagers surveyed do not view sending illegal material as a risk, despite knowing that grooming is a possibility.<sup>7</sup> Sending self-generated images has become so normalised amongst many teenagers that they do not know the risks until they become victims. We are disappointed that, given the risk children and young people may not understand the level of harm sending images can cause to themselves, the codes of practice fail to place a higher duty of care on platforms, especially if they utilise end-to-end encryption, affording greater protection to children.
8. Evidence shows that children who have been victimised and experienced grooming are likely to suffer from serious long-term mental health issues such as anxiety, depression, post-traumatic stress, and suicidal thoughts. This is even more acute if children have been solicited into creating and sharing self-generated images.<sup>8</sup> Given the particular vulnerability of children, this area of risk needs to be continually monitored and assessed to ensure that all potential ways that grooming can happen online are monitored and assessed by each platform.

<sup>2</sup> National Crime Agency 'National Strategic Assessment' July 2023 [Director General Graeme Biggar launches National Strategic Assessment - National Crime Agency](#)

<sup>3</sup> BBC News ['Claims Schoolgirl 11 groomed on Spotify'](#) 13<sup>th</sup> January 2023

<sup>4</sup> MSN News [Over 90% of child sexual abuse content on internet is now 'self-generated'](#), 17<sup>th</sup> January 2024

<sup>5</sup> The Guardian [Meta begins rolling out end-to-end encryption across Messenger and Facebook](#) 7<sup>th</sup> December 2023

<sup>6</sup> Silicon Republic [Instagram is connecting large paedophile networks, report claims](#) 8<sup>th</sup> June 2023

<sup>7</sup> Karlsson, J and Josephson, S ["Everything that is not a yes is a no"](#) ECPAT 2021

<sup>8</sup> INHOPE [The impact of online grooming](#) 22<sup>nd</sup> July 2022

9. CARE is concerned that the risk of harm from AI and ‘nudification apps’ is not included in the CSAM section. This is causing harm now and is likely to become a higher risk in the coming years. We note too that “*Artificial intelligence algorithms play a key role in the pornography industry and appear to be driving escalation to more violent material, inducing high levels of sexual dysfunction in consumers and creating appetites for viewing child sexual abuse material (CSAM).*”<sup>9</sup> This needs to be addressed now and should be included in risks.

### Risk to Adults – Sexual Exploitation and Extreme Pornography

10. The consultation document states “*Beyond prosecutions, there is little evidence assessing the scale and nature of extreme pornography online. It is hard to establish the likelihood of a user encountering this illegal content.*” (Volume 2 paragraph 6l.12) This comment is surprising given the large body of evidence that highlights the volume of illegal and harmful material easily accessible and available online. Indeed, this was recognised by research produced for the Government in 2020, which noted, “*there is little proactive regulation of extreme pornography, meaning that users may be able to access unlawful material on legal porn sites. Current research at Durham University has found content on the landing pages of the top three porn sites in the UK that could be classified as extreme pornography, as well as content that is in clear contravention of the sites own terms and conditions. This means that users in England and Wales who do not know the law on pornography may be unaware they are accessing illegal material.*”<sup>10</sup>
11. A study by Durham university in 2021 found a considerable amount of content on the main user-to-user sites was illegal or violent.<sup>11</sup> The study concluded “*We have found that mainstream pornography websites are likely hosting material that is unlawful to distribute or download. It is not the case that criminal material is relegated to niche sites, hidden from all but a determined NY viewer, or only available on the dark web. It thus cannot be assumed either by regulators, individual users or policymakers, that the mainstream websites are ‘safe’ sites, free from unlawful material.*” The hosting of illegal and violent pornography on user-to-user services is now mainstream and requires robust regulation and enforcement to ensure it is removed from online platforms.
12. Following the New York Times investigation into Pornhub<sup>12</sup> the platform was forced to remove over 10 million videos, amounting to around 80% of its content.<sup>13</sup> The operators of the site could not be sure, and had no way to determine, what content was illegal content on their site. It is clear from this action that large user-to-user sites are unable to deal with the levels of potentially illegal and extreme material hosted on their platforms and illegal, extreme, and harmful content is freely available.
13. In relation to search services, Professors McGlynn and Woods in May 2022 noted that “*Pornography, including extreme pornography, is easily accessible via the most basic, one-click search on google. This includes the easy search for and return of extreme pornography, other illegal porn and incest porn.*”<sup>14</sup>
14. The consultation document highlights that there have been limited studies on the impact of extreme pornography (paragraph 6l.18). This assertion is surprising given the effects of extreme pornography on adults have been studied from as far back as 2007.<sup>15</sup> A study from 2007 concluded that:
- The existence of some harmful effects from extreme pornography on some who access it. These included increased risk of developing pro-rape attitudes, beliefs and behaviours, and committing sexual offences. Although this was also true of some pornography which did not meet the extreme pornography threshold, it showed that the effects of extreme pornography were more serious.

<sup>9</sup> Sharpe, M., Mead, D. Problematic Pornography Use: Legal and Health Policy Considerations. *Curr Addict Rep* 8, 556–567 (2021). <https://doi.org/10.1007/s40429-021-00390-8>

<sup>10</sup> *The relationship between pornography use and harmful sexual behaviours A primary research report prepared for the Government Equalities Office*, 20 February 2020, page 17

<sup>11</sup> *Sexual violence as a sexual script in mainstream online pornography | The British Journal of Criminology | Oxford Academic (oup.com)*

<sup>12</sup> New York Times *Opinion | The Children of Pornhub - The New York Times (nytimes.com)* 4th December 2020. The investigative piece highlighted CSAM online, but the article led to major credit cards refusing to process payments until all illegal and non-consensual material was removed. See footnote 10

<sup>13</sup> BBC News *Pornhub removes all user-uploaded videos amid legality row* 14 December 2020

<sup>14</sup> *Pornography and the UK's Online Safety Bill by Clare McGlynn, Lorna Woods, SSRN*, July 2022, page 3

<sup>15</sup> Catherine Itzin, Ann Taket, Liz Kelly *The evidence of harm to adults relating to exposure to extreme pornographic material* Ministry of Justice, September 2007

- Men who are predisposed to aggression or have a history of sexual and other aggression were more susceptible to the influence of extreme pornographic material.<sup>16</sup>
15. The harms of pornography which have been noted by frontline workers working with those who display harmful sexual attitudes and behaviours were reported in Government research in 2020. Support workers have observed:
- unrealistic expectations for sex including “physical aggression during sex (including choking, slapping, hair pulling)” – i.e. rough sex. In another place in the report, a worker is quoted saying, “*On Pornhub, you don’t have to look in the rough sex category to get rough sex, there are just standard videos of men having sex with women and grabbing them by the throat.*”<sup>17</sup>
  - lack of awareness/concerns consent including acts of sexual harassment.<sup>18</sup>
  - verbal or physical coercion: “*rape, forcing women to perform sexual acts, or obtaining sex / sexual acts by gradual wearing down through repeated requests, manipulative language and/or unbalanced power dynamics.*” In another place in the report, it says workers “*highlighted concerns of the widespread depiction of sex under conditions that constitute rape.*”<sup>19</sup>
16. The Government’s 2021 Tackling Violence against Women and Girls Strategy reported that their “*Call for Evidence showed a widespread consensus about the harmful role of violent pornography can play in violence against women and girls, with most respondents to the open public surveys and many respondents to the nationally representative survey agreeing that an increase in violent pornography has led to more people being asked to agree to violent sex acts...and to more people being sexually assaulted.*”<sup>20</sup>
17. The British Board of Film Classification reported in January on their 2019 findings of young people’s use of pornography. They found that “*Beyond creating unrealistic expectations of sex, some young people felt pornography had actually affected their expectations of, and behaviour during, sex, particularly in the copying of “rough” or “forceful” sex seen in pornography.*”<sup>21</sup>
18. In a 2019 survey of 2002 women conducted for Radio 5 Live, women reported differing levels of violence during sex.<sup>22</sup> Of these incidents 53% were reported as unwanted some, most or all of the time they occurred; 20% reported that the experiences left them feeling upset or frightened at least once; 42% of the women felt pressured, coerced or forced some, most or all of the time they occurred.<sup>23</sup> In February 2020, a similar survey was conducted with 2049 men asking them similar questions. 57% of the men said that they were influenced by pornography either to some extent or a great deal. 20% said “*a great deal*”.<sup>24 25</sup>
19. Some of the evidence cited above is violent pornography that may not meet the definition of extreme pornography. This clearly makes the issue much more prescient as viewing legal pornography clearly causes harm, the viewing of extreme pornography may well result in greater harm, as has been report in recent criminal cases.<sup>26</sup>
20. Despite the contention of the consultation document, clear evidence, dating back to 2007, continually points to the harm of extreme and sexually exploitative pornography for women and children. It is concerning that much of the evidence highlighting the risk of extreme pornography and violence against women and children

<sup>16</sup> Ibid, page iii

<sup>17</sup> The relationship between pornography use and harmful sexual behaviours, *Op Cit*, page 20

<sup>18</sup> Ibid, page 14

<sup>19</sup> Ibid, pages 14

<sup>20</sup> [Tackling Violence against Women and Girls Strategy](#), HM Government, July 2021, page 35

<sup>21</sup> Young people, Pornography & Age-verification, BBFC, January 2020, page 46. <https://www.revealingreality.co.uk/wp-content/uploads/2020/01/BBFC-Young-people-and-pornography-Final-report-2401.pdf> Note that this research contains graphic sexual content and pornographic language

<sup>22</sup> ‘A man tried to choke me during sex without warning’, 28 November 2019 <https://www.bbc.com/news/uk-50546184>

<sup>23</sup> See Q1, Q2, Q3, Q4, from data tables <https://comresglobal.com/polls/bbc-radio-5-live-womens-poll-november-2019/>

<sup>24</sup> See Q1\_1, Q1\_2, Q1\_3, Q1\_4, Q1\_5, Q5, from data tables <https://comresglobal.com/polls/bbcs-disclosure-and-radio-5live-survey-of-men/>

<sup>25</sup> See also ‘[I thought he was going to tear chunks out of my skin](#)’, BBC News, 23 March 2020

<sup>26</sup> Daily Mail ‘[A violent oddball obsessed with guns and porn](#)’ 10<sup>th</sup> July 2021

(as set out above) has been largely ignored. This type of content is illegal offline and should be illegal online and Ofcom should ensure it is not on platforms within scope of the Bill.

21. Service providers also need to be aware of links between pornography and human trafficking and assess for the risk that pornography on their platforms has been produced without the consent of the person portrayed.<sup>27</sup>

### Alignment of Illegal Material Online with Offline

22. The consultation document does not address the issue of the divergence in enforcement of laws online and offline. It is clear that illegal material is being widely shared, distributed and monetised online. This risk needs to be addressed in volume 2.
23. This requirement would include removing videos depicting sexual activity with actors or characters who look like children: petite, young-looking performers made to look underage through props such as stuffed toys, lollipops and school uniforms and sexual activity between family members, particularly step-families. Content such as this normalises children as objects of sexual desire, driving the demand for 'real' child sexual abuse material and in some cases can lead to online and offline abuse.<sup>28</sup>
24. It is clear that this issue is not addressed properly in the consultation document. In Volume 5 paragraph 26.152 it states: "We also recognise that sex workers exist, whose business may depend on them looking younger than they are. If a service had good evidence that a person who looked underage was in fact over 18, our guidance would not require it to take the content concerned down." If a person is made to look underage, this would not be allowed offline and given the harm such content can cause to children, Ofcom should reflect on this paragraph and the approach taken to online pornography in general.

---

<sup>27</sup> For examples see Luzwick, A, Human Trafficking and Pornography: Using The Trafficking Victims Protection Act to Prosecute Trafficking for the Production of Internet Pornography, [Northwestern University Law Review](#), 2017, Vol 111, pages 137-153

<sup>28</sup> Insoll et al [Risk Factors for Child Sexual Abuse Material Users Contacting Children Online](#) February 2022

### Volume 3

#### Question 3 - Do you agree with our proposals in relation to governance and accountability measures in the illegal content Codes of Practice? Please provide underlying arguments and evidence of efficacy or risks to support your view.

25. While governance and accountability are important aspects of the code of practice and companies must ensure that proper structural accountability is in place to ensure all risks are being taken into consideration, CARE is concerned that the balance of the codes of practice is more concerned with organisations and reputational risk than the needs of people. People at risk, victims and survivors need to be visibly at the heart of implementation of the Online safety Act.
26. The document states at paragraph 8.31 *“Most large services will be run by companies that already have an existing governance body or board which is ultimately responsible for oversight of risk management and compliance activities.”* The document suggests that these large companies will merely have to prepare an annual paper to comply with the duties of the Act and have their board scrutinise that paper to ensure compliance. Given many of the large user-to-user pornography sites, with users vastly in excess of 7 million, do not take their duty to remove illegal material seriously, governance and accountability based on current practice, with additional reporting and scrutiny is not going to lead to action to remove illegal material from these platforms.
27. As noted above, when Pornhub was challenged by credit card companies to remove illegal material or to have financial processing of payments suspended, the platform removed 20% of its total content. Clearly existing governance, accountability and compliance was failing.
28. Failure of current systems is not confined to Pornhub. A study by Durham university in 2021 found a considerable amount of content on all the main user-to-user sites was illegal or violent. The study concluded *“We have found that mainstream pornography websites are likely hosting material that is unlawful to distribute or download. It is not the case that criminal material is relegated to niche sites, hidden from all but a determined viewer, or only available on the dark web. It thus cannot be assumed either by regulators, individual users or policy-makers, that the mainstream websites are ‘safe’ sites, free from unlawful material.”* The hosting of illegal and violent pornography on user-to-user services is now mainstream and requires robust regulation and enforcement to ensure it is removed from online platforms.
29. In many cases, the operators of large pornography user-to-user platforms know that the content they host is illegal or that the person depicted in the content has been trafficked and they still choose to allow it to remain on the platform and distribute the material.<sup>29</sup> CARE is concerned that it will take more than the £16,000 to £36,000 per year cited at paragraph 8.31 of volume 3 to fix the problem. The governance and accountability measures currently utilised by large pornography websites are broken and it is clear that a victim/survivor centred approach is needed to ensure that material is removed, but also that processes are put in place to ensure the material does not appear on the platform in the first place. This will require a radical overhaul in how pornographic websites conduct their business. Currently there is limited moderation for onboarded content to the site, either by technology or through human screening of videos.
30. It is estimated that no more than 80 content moderators are employed by MindGeek to moderate all its content (including Pornhub).<sup>30</sup> To screen every piece of content uploaded to Pornhub alone would require each of the 80 moderators to watch over 17,000 hours of uploaded videos per year. In evidence to the Canadian Parliament in 2021, Feras Antoon, CEO of MindGeek Canada stated *“every single piece of content is viewed by our human moderators”*<sup>31</sup> Given there are only 8,760 hours in a year, it is not possible for the content moderators they employ to screen material. The current procedures, as set down by the company, are not being followed. Moreover, if every piece of content onboarded to the platform is moderated in some fashion,

<sup>29</sup> BBC News [Pornhub owner settles with Girls Do Porn victims over videos](#) October 2021

<sup>30</sup> Fight the New Drug [13 Times MindGeek Executives Reportedly Didn't Tell the Full Truth to Canadian Lawmakers](#) June 2021

<sup>31</sup> House of Commons Canada STANDING COMMITTEE ON ACCESS TO INFORMATION, PRIVACY AND ETHICS [Hearing 5<sup>th</sup> February 2021](#) IETHI 119 page 3 col 1

how does CSAM and other illegal extreme pornography appear on the platform; and in some cases remain on the platform long after a complaint has been made?<sup>32</sup>

31. At paragraph 8.16 the consultation states “*Our first Codes are aimed at establishing robust governance and accountability processes and represent a basis on which to build. We anticipate making further updates to our Codes through a process of iteration as our evidence base evolves.*” The codes of practice are clearly designed to build on what is already happening within online platforms. However, it is clear that the practices of pornography sites are failing and there is nothing solid upon which to build. It is not further updates to codes of practice that are required, but rather root and branch change.
32. The consultation document implies that current procedures and practices will be taken ‘on trust’ and those practices will be the foundation for dealing with illegal material. Clearly this approach would be disastrous for pornographic content, given the current procedures are failing. Providers of pornographic content have demonstrated that they are incapable of putting in place governance arrangements that prevent illegal harms being perpetrated through their platforms. CARE is concerned that the codes of practice, if they are based on current governance structures, will be incapable of bringing change. Ofcom must bring forward proposals that are robust, the current proposals will not deal with illegal harm on platforms that onboard pornographic content.

#### **Question 4 - Do you agree with the types of services that we propose the governance and accountability measures should apply to?**

33. CARE is concerned with the proposal to treat large platforms that host user-to-user pornography differently to smaller platforms. While it is impossible to say how many user-to-user pornographic websites exist, it is estimated that around 4% of active webpages carry pornographic content.<sup>33</sup> That would equate to millions of websites and while it seems that there are different types and sizes of providers operating, the reality is that online pornography is largely dominated by a small number of operators that run multiple platforms. The APPG on Commercial Sexual Exploitation reported last year that “*while there are a vast number of pornographic websites on the internet, there is not an equivalent number of corporate entities reaping profits from the content on these websites. Instead, the pornography industry today is characterised by market dominance.*”<sup>34</sup>
34. CARE is concerned that large pornographic websites may be incentivised not to accurately report their users or to open multiple websites to drive traffic away from a main site to ensure that their platforms remain below the threshold for a large platform
35. Indeed, given the unusual structuring of the pornography industry, a platform that appears to be small or medium in size, can in fact be part of a much wider corporate entity. Given the secrecy that shrouds ownership of the industry, the highest standards and duties should apply to all pornography websites and corporate entities should be required to report owned and linked entities as part of the reporting process.

#### **Question 8 - Do you think the four-step risk assessment process and the Risk Profiles are useful models to help services navigate and comply with their wider obligations under the Act?**

36. While the four-step risk assessment process seems reasonable for most content providers, as set out above, pornographic content providers have been well aware of the risk their service poses and have been ambivalent in assessing that risk and removing harm. It is concerning that the consultation document discards the option of designing risk profiles by service type, citing the example of adult online content, because “*several well*

<sup>32</sup> BBC News ‘[I was raped at 14, and the video ended up on a porn site](#)’ 10<sup>th</sup> February 2020

<sup>33</sup> EarthWire ‘[How many porn sites are there](#)’ March 2023

<sup>34</sup> ALL-PARTY PARLIAMENTARY GROUP ON COMMERCIAL SEXUAL EXPLOITATION [Pornography regulation: The case for Parliamentary reform](#). 2023

*recognised service types (e.g. social media services and online adult services) contain a complex and wide range of characteristics, each with different levels of risk” (Table 9.3 page 65). The risk of pornographic user-to-use sites is known, the characteristics of these type of content providers is extremely well established and evidenced. The failure of pornographic content providers to remove illegal material or prevent its onboarding is well attested (as set out above). Given the known risk and past failures, clear pornographic specific content profiles should be applied to social media and user-to-user pornographic content providers that host pornographic material.*

37. It is concerning that the relevant considerations for the preferred risk profile are based on the level of burden to the service provider (option I page 64). The focus should not be the level of burden placed on the service provider, rather, the focus of the entire codes of practice, should be focused on the victim/survivor and persons deemed to be at harm. The overriding consideration should be the option that minimises harm, regardless of burden on the service provider.



## Volume 4

### Question 12 - Do you have any comments on our overarching approach to developing our illegal content Codes of Practice?

38. Paragraph 11.7 states “Services that choose to implement the measures we recommended in our Codes of Practice will be treated as complying with the relevant duty. This means that Ofcom will not take enforcement action against them for breach of that duty if those measures have been implemented.” This approach is particularly concerning when applied to pornographic websites. User-to-user sites and social media that host pornographic content have failed to deal with illegal content and harm on their platforms – i.e. the outcome for users. The codes appear to be an input based ‘tick-box’ exercise. It is concerning that a platform may merely show willing and that is enough to potentially exempt them from enforcement. As set out above, the harm from the publication of CSAM and illegal/extreme pornography is high, therefore content providers must be held to a higher standard than simply ticking a box. CARE is concerned that illegal material and CSAM on content providers hosting pornography will not be removed and organisations will not be held responsible for failing to meet the purpose of the Act to make “the use of internet services...safer for individuals in the United Kingdom” (section 1(1)).
39. This approach disincentivises content providers to do anything other than implement the minimum standard. If a provider is told that following the codes mitigates all enforcement, they are unlikely to seek out innovative ways to go beyond the codes and make their platforms safer by design.
40. Content moderation, which is key to mitigating harms for pornographic content, is focused on content take down/removal, rather than prevention. For user-to-user services annex 7, paragraph A4.2 states “The provider should have systems or processes designed to swiftly take down illegal content of which it is aware”, for search services the relevant part of the codes is annex 8 paragraph A4.2 which states “deindex or downrank illegal content of which it is aware.” There is no obligation to ensure that the service implements measures in the design of the platform that mitigate risk. A safety by design approach holds the services responsible for the safety of users by assessing, addressing, and mitigating potential harms before they occur. This is a shift in the focus from the proposed codes of practice which focus on mitigation after the harm has been onboarded, rather than prevention.

CARE Public Policy Team | 53 Romney Street | London | SW1P 3RF | t: 020 7233 0455 |

Email: [REDACTED]