

## Submission: Sam Guinness Online Safety Bill Consultation

My name is Sam Guinness (MSC Media and Communications LSE; Undergraduate History University of Bristol). I'm 26 and from South West London. I'm the founder of the Coalition Against Digital Coercive Control. I have been communicating with groups within the UK that specialize in internet governance to get an idea of the scale of the digital violence and what can be done to mitigate the problem. I've talked with the likes of the Police Foundation, Demos, Privacy International, the Open Rights Group, the Law Commission the Oxford Internet Institute, the Cyber Helpline, the Coalition Against Cyberstalking, Refuge, Women's Aid and The Times. In 2022 I successfully contributed towards a cyberstalking amendment on the Online Safety Bill. At the moment I'm working with internet charities, like 5 Rights, and Conservative, Labour and SNP politicians on having SnapChat Maps banned because of the cyberstalking threat. I attend meetings with the Carnegie Trust, chaired by Lorna Woods and Will Perin discussing internet governance issues with politicians, charities, journalists and lawyers. In 2021 I worked with the BBC on developing a three part documentary on hacking culture.

## Case for an Ombudsman: The Online Harms Bill and the Internet User

1. The Online Safety Harms Bill provides the greatest power to impose British parliamentary internet governance attitudes on Social Media Companies through the independent watchdog Ofcom. The most important function of the Online Harms Bill needs to be to address the failure in communication between the user and the social media platform, thus empowering the constituents of Members of Parliament whose lives are transformed through the design and functioning of social media platforms. At the moment the Online Safety Bill has failed to build an avenue for the Social Media user to offer communication and complaint about how Social Media Platforms are being used. In order to understand how social media users are experiencing the technology it is necessary that you create an ombudsman.
2. Ofcom have designed a taxonomy of illegal and legal but harmful features that social media companies must provide risk assessments on or risk being investigated, Ofcom have the ability to demand interviews and data, or risk being deducted of 10% of profits. The taxonomy of harm includes hate crime, encouraging or assisting suicide, offences relating to revenge and extreme pornography, harassment and stalking, and incitement to and threats of violence.
3. These risk assessments will be made available to the public through transparency reports providing great new levels of data for researchers, campaigning charities and most importantly the user. The information provided in these transparency reports will be based on the taxonomies of online harms provided by Ofcom.
4. The Government will not be making an ombudsman for the internet user to make complaints about the practice of social media companies meaning that the user has no way of communicating how they are experiencing the deployment of social media platforms. From my experience working on cyberstalking and helping introduce the Online Safety Bill cyberstalking amendment, I am aware that the state and police's failure to understand the threat posed by social media platforms and internet technologies has left Domestic Abuse charities overburdened with handling complaints on internet abuses. An ombudsman would provide the first effective outlet for the public to make communication with the state on how social media and technology was being experienced by the users.

The government has encouraged the use of site to user complaints processes, many of which are already in operation and fail to offer the support for victims of online abuse or cyber stalking may experience. My work as a campaigner with the Coalition Against Digital Coercive Control has demonstrated that the Social Media complaints systems are consistently unresponsive.

If the user wants to make complaints towards Ofcom this will need to be through an 'eligible' body as defined through the principles set by the Home Secretary. In the absence of a working ombudsman means a charity will need to. The government's suggestion that social media users, many just children, go to the courts to take on multibillion pound American silicon valley companies is a complete fantasy somewhat suggestive of a failure to understand the power these companies have over children and young people.

In the absence of an ombudsman I'm not sure how Ofcom will have the ability to effectively evaluate the performance of social media companies because they will be without the data needed to understand users experiences of social media platform and rely to heavily upon social media companies whose business imperative is to extract behavioural data and make money.

Consequently it is urgent that some form of Ombudsman that allows the British social media user to communicate with the watchdog over how they are experiencing the social media platform.