INTERNET WATCH FOUNDATION INSPECTION REPORT 2022

INTRODUCTION

1. Child sexual abuse material (CSAM) is a global phenomenon but whilst the Internet, and access to it, is internationally available, methods of enforcement are essentially national and can only be effective internationally where there is effective agreement and co-working between national agencies. The Internet Watch Foundation (IWF) was created in 1996 by the online industry as a self-regulatory body designed to work effectively with police and other enforcement agencies, both national and international, as well as with educators, government and the industry itself. Its specific remit is to work internationally to remove online images and videos (Child Sexual Abuse Material (CSAM) and, when hosted in the UK, non-photographic images as well. In 2005 IWF became an independent charitable organisation with its own Board.

2. Much has changed over that period in the online world both for good and ill. In 1996 18% of known CSAM was hosted in the UK whereas in 2021 it was 0.15%. That may, of course, reflect the growth of available CSAM but it also represents increasingly effective domestic enforcement. On the other hand, on the basis of reports received by IWF 72% of CSAM is still hosted in Europe, which includes for these purposes Russia and Turkey. Certainly the last 10 years have seen a growth in reporting from 41,877 in 2011 to 361,062 in 2021. Of that latter number 252,194 were confirmed as actionable CSAM. The sensation of sprinting to stay still is well understood in this area. The current age range featured in CSAM in 2021 was predominantly 7 – 13 (91%) with girls featuring in 97% of material, an increase from the 65% in 2011; boys had featured in 26% of CSAM in 2011 but in 2021 it was down to 1%. This contrasts strongly with reports submitted through Report Remove in 2022 in which boys form the majority. One significant development is that by 2021 about 72% of all CSAM appears to be "self-generated", although the subject is usually under adult control.

3. It is clear that online CSAM has grown and is growing. The role of enforcement, and specifically the role of IWF, has never been more demanding or more necessary. The effective and lawful functioning of IWF is clearly a matter of prime importance.

4. This is the report of an independent commission of inspection requested by the Board. The last such inspection was in 2019 and the report of that inspection remains publicly available. This inspection took place on 22/23 November 2022. The team comprised:

- Sir Mark Hedley, a retired High Court Judge.
- Nigel Gibbons, Director and Senior Advisor at NCC Group Plc.
- Georgina Clifford, Specialist Clinical Psychologist and Director of London Trauma Specialists
- Keith Niven QPM National CAID IT Implementation Lead, Norfolk Constabulary

The board may wish to minute its consideration of the issues raised by the team.

<u>TERMS OF REFERENCE</u>

5. We were provided with the following terms of reference: –
- To comment on whether the Hotline and Administrators' Manuals are fit for purpose and whether the procedures are complied with by staff.
- Quality check active child sexual abuse URLs and hash images for consistency of decision-making and managerial oversight.
- Sample previous child sexual abuse content screen captures for consistency of decision-making and managerial control mechanisms.
- Review and comment on administration in discharging content assessment complaints.
- Consider Internet Content Analysts' training requirements to enable them to undertake their roles confidently and accurately.
- Sample work of the Quality Assurance team to ensure adequate, objective and representative testing and reporting mechanisms.
- Review Hotline security arrangements and conformance with ISO/IEC 27001.
- Review and comment on Hotline welfare arrangements including recruitment processes, counselling arrangements and general support mechanisms comparing with other good models of good practice in law enforcement and other professions.

OUR METHOD OF WORK

6. Our method of work, as in previous inspections, was to agree what and whom each of us would see in accordance with our individual expertise. We shared and considered our broad conclusions. We then decided we would, as requested, write a report for publication on the website. At the same time specialist members wrote up their own conclusions and recommendations, much of which had already been shared with staff during the inspection. Those conclusions contain both material which does not need to appear in the public domain and which also is so detailed, as is necessary for communication to individual staff members, but which would make this report unmanageable. Accordingly we have decided that all the accumulated material would be released internally to IWF at the same time as this report is published.

7. **This report is one to which we have all contributed and on which we are all agreed.**

THE HOTLINE (ToR 1-3)

8. This has expanded significantly since our last inspection both in terms of remit and personnel. The remit has increased by the addition to the team of analysts a team of assessors whose task is to assess images held in Home Office controlled databases both for inclusion as CSAM and, where they are included, to grade them. There has as a consequence been an increase in senior personnel with a new Hotline Director, a new Hotline Manager and a Deputy. The number of senior analysts has also been increased. This has the advantage of addressing concerns expressed in previous reports over succession management and planning with the diversification of institutional experience and expertise.

9. **The Hotline and Administrators Manuals (ToR1)** have now all been digitalised. That has also included new material needed by the team of Assessors. The material has been put into a significant number of folders, each dealing with specific areas of work. Whilst they hold inevitably a considerable amount of substantive content, they are well indexed and easily accessible to analysts and assessors. We both looked at the material and sat with staff accessing and using it. **We were satisfied that the manuals were fit for purpose and that the procedures were complied with by staff.** Whilst it is never possible wholly to eliminate human error, we were satisfied that the combination of quality assurance monitoring and staff oversight (discussed

further below) sufficiently addressed the matter so as to ensure that the quality of work overall remained excellent and the reputation of IWF unimpaired.

10. **ToR 2,3,5 and 6** are conveniently taken together since they are so inter-related. In order properly to consider this matter, which is central to the work and reputation of IWF, it is necessary to consider the work actually undertaken. The consideration and capture of CSAM by **analysts** arises in one of two ways: first, there is a public reporting arrangement; and secondly analysts are encouraged to use their own knowledge and expertise to explore the Internet with a view to discovering CSAM wherever in the world it is being hosted. Whilst reports from the public leads to only about 12% of this CSAM that is actionable (this does not include actionable, duplicate, reports), it represents a significantly higher proportion of the work that needs to be assessed. It is a much less efficient process for the capture of CSAM than the work done on analyst's individual initiative. That said, two further comments are needed. First, this facility is the primary public face of IWF and is appreciated as such; the public value of IWF would be diminished if this facility were not available. Secondly, when three of these reports were actually followed through with one member of the inspection team, all of them yielded actionable CSAM.

11. Once material has been discovered, it must then be **assessed** as to whether or not it is criminal material. If it is not, then it will be "discounted" and no further action taken. If it is assessed as criminal material, it will be graded A, B or C in accordance with domestic law. Such material will be "actioned" by blocking the URLs (pending removal) and the images are hashed. URLs and hashes are subsequently made available to industry Members for blocking and detection. IWF notices and reports are disseminated globally to stakeholders, which may include platform hosts (in effect a take-down order) and/or to domestic or international law enforcement agencies. It will be apparent that the process of assessment and grading is central to the work of IWF, and considerable responsibility is placed initially on the analyst. In such circumstances caution is inevitable. There had been a concern that undue caution was being exercised at the boundary of non-criminal and grade C material. The recommendations in earlier reports to have a grade C (lower threshold) so that careful thought could be given to the patrolling of the critical border, has been implemented. It was noticeable on this inspection that there was much more confidence in actioning borderline cases reasonably regarded as

criminal, particularly where the image was either an early part of a series or was posed clearly for no reason other than CSAM.

12. The work of the **assessors** is likewise focused on grading. Their material is supplied from law enforcement databases, principally through the Child Abuse Image Database (CAID). However, their work is the same as that of analysts once the work of assessment begins. Their gradings are respected and trusted by law enforcement agencies and will form a key component of the enforcement processes.

13. In previous reports attention has been drawn **to the difficulties inherent in assessments.** In many respects these difficulties remain. In particular difficulties are created in the assessment of age; it is easy for a 14-year-old to look 18 just as it is easy for an adult to look 14 if determined to do so. Pre-pubescence remains usually obvious; adolescence presents much greater difficulty. Here caution is inevitable in relation to any young person appearing to be 15 or older. That said, there have been two significant advances. First, the knowledge about young people who regularly appear in CSAM has grown greatly so that there are more cases where the actual age of the subject is known, and action can be taken on that basis. Secondly, there have been developments in facial recognition techniques – which again have enabled a greater knowledge base of the age of subjects of CSAM.

14. For all this to work successfully, **quality assurance** is essential. This is achieved in two ways: formally and informally. The informal, and two members of the team saw this in action, comprises an evident readiness to seek the opinion of others, both analysts and assessors, and those in more senior positions. This was a regular feature of the workplace and conducive both to accuracy and consistency. This alone is of course not enough because it can simply institutionalise error and so a formal process is also required.

15. The formal process assumes three forms. First, there are a number of **quality assurance analysts and assessors** who will together oversee the work of the analysts and assessors. Indeed, each individual decision is likely to be considered. If quality assurance disagrees, the matter is taken up with the relevant analyst or assessor. It appears that intervention rates are between 8% and 10% (which seems reasonable) and mostly involve technical rather than substantive errors. A record is kept of quality assurance on each analyst or assessor to discern inconsistency or repeated error at an early stage. We were impressed that this system seemed to operate with the goodwill of all,

providing reassurance rather than threat to the analysts and assessors. The second formal string is the role of **senior staff** both in the encouraging and training of their teams and in dip-sampling work (including quality assurance work) and assessing quality and trends. Again we were impressed by the acceptance of this system without fear of threat or of being undermined. There was a general view not only that the work was difficult and that more than one view was useful but also that there was sometimes room for more than one reasonable view.

16. The third string was **training**, both induction training and continuous professional development training. We were particularly impressed with the quality of induction training but recognise that training across the Hotline generally was of high quality. In our reflections we wondered whether the training of the trainers was sufficient and when we raised the issue with them, there was acknowledgement of it. Some detailed suggestions for further training (and how the necessary expertise might be sourced) has been provided by Mr. Fox directly to the responsible staff. We would, however, encourage the Board to reflect on whether and, if so, how the question of training the trainers should be further addressed. That said, **we were satisfied with the overall levels of consistency in decision-making and in quality assurance and management oversight.**

17. **Complaints (ToR 4).** We also examined the complaints procedure. We should, however, make an initial observation. The appeal procedure to address a complaint about a "takedown" order has never been invoked and remains unused and therefore untested. This is despite an increased confidence in requiring takedowns of CSAM at the borders of criminality. The complaints procedure divides into two: Hotline complaints and general complaints. In the case of Hotline complaints, none have been upheld as all have either been outside the remit of IWF or have been found to be vexatious or irrational. One of the team reviewed all those complaints and was satisfied that the outcomes were reasonable. In relation to general complaints, there were none that related to staff misconduct. Most were summarily addressed to the apparent satisfaction of the complainant. One, which involved a sensible and positive suggestion from the complainant, was upheld. **We were satisfied that the complaints system was fit for purpose and was operating satisfactorily.**

18. **WELFARE ARRANGEMENTS (ToR 8).**
    It is obvious that working for IWF requires high quality welfare arrangements to be put in place. The whole process was carefully explained to and explored

by Dr. Clifford. Her personal overview, which was reinforced by the impression created on all team members during the Inspection, is worth quoting in full.

"The senior management team at IWF described their welfare programme in detail and were incredibly open to discussion and suggestions for improvement. Overall, my opinion was that IWF have an excellent, carefully considered and ever-evolving welfare package in place for their staff. They describe a trauma-informed approach to assessing the suitability of new staff for the role, with a comprehensive and rigorous interview and induction process. Once staff are employed, a number of procedures are in place which enable the senior management team and individual line managers to be continually mindful of shifts in presentation and behaviour that might be indicative of psychological difficulties or reduced resilience to the work. IWF offer their staff 1:1 counselling sessions with an independent counsellor and additional sessions on request. All staff also meet a Clinical Psychologist and trauma specialist for a yearly independent psychological assessment, who informs the senior management team if he has any concerns about an individual's ability to work."

A series of potential action points has been communicated to relevant staff members and is included in Dr. Clifford's report disclosed to them. We recommend that the Board ensures that these action points have been carefully considered by the relevant staff and any necessary action taken.

19. CYBER SECURITY (ToR7).

It is equally apparent that both the sensitivity of the material involved and the growth in the range of work, and therefore in staff members, means that cyber security is a critical risk area in the work of IWF. Moreover, failures in this area do not simply come at potential personal cost but may incur substantial reputational damage to IWF. Clearly much of the audit work that has been done is of a highly technical and detailed nature, which has already been communicated to the relevant senior staff and which is included in Mr. Gibbons' report disclosed to them. However, a general flavour can be discerned in the following substantial quotation from his report: –

"The IWF has seen a significant increase in its business activities and demand for its services over the last few years with a commensurate level of investment across the business which is reflected in the findings.
The organisation has strengthened its cyber capabilities and resilience significantly since the last audit report. The appointment of a Chief Technology

Officer (CTO) has steered the organisation's technology and cyber investment, supported by investment in new technology and the evolution of supporting services. This is resulting in improvements in cyber hygiene across the business with a clear roadmap and involving designs for continued improvement.

The organisation showed a maturing attitude to risk with a practical approach to the risks of data loss. Senior management recognised that the risk from individual analysts and assessors was limited following improvements to user level workstation data egress controls. This is a reflection of the daily one-way transfer content from individual workstations to secure systems on separate networks. This reduces the potential volume of data available for egress through this insider risk surface. The network segregation design also provides similar levels of insulation from third-party threat actor breaches with the backed data network being isolated at a logical level from external network connectivity. This network design continues to be improved with additional measures planned to harden the network segregation boundaries with additional network controls complemented by the strengthening of user identity access management and evolution from device network switching to Virtual Desktop Infrastructure (VDI)....

The IWF is in a good baseline state of Cyber Security with an improvement roadmap that will see its resilience increase over the coming months as the current transformation plans shared with [me] are resourced and executed. There is a strong positive culture in the IT team that bodes well to confronting challenges and adapting in the face of the dynamics of the threats to digital environments and the unique nature of the IWF mission.

Although we were heavily dependent on the advice of Mr. Gibbons, the general impression created in the team was consistent with his detailed expert assessment. Again we would recommend that the Board ensure that the contents of his report have been carefully considered by the relevant staff team and any necessary action taken. In particular the Board may have to consider resource priorities when addressing cyber security both in terms of technical equipment and personal expertise. It may also need to consider the implications of protection systems for what is usually illegal material (i.e. it cannot go off site) as well as issues arising from monitoring, detection and response which constitute threats to cyber security. This may involve a review of security policies and control frameworks as well as network access controls.

20. GENERAL CONCLUSION

Our general conclusion is well summarised by Mr. Niven in his report disclosed the relevant staff, where he says this: –

"The IWF is an extremely professional and well-managed organisation led by a strong but caring and compassionate leadership team. The mission is clearly understood by all staff members who are committed to protecting children from the serious harms that can be inflicted by the perpetrators of online child sexual abuse."

We were impressed by the sense of mutual support and reassurance that we found among staff at all levels and between all levels. We were also reassured that there was a conscious commitment to sharing acquired institutional experience and expertise so that IWF could survive the loss of any one staff member. We commend our report to the Board with our thanks for the support and assistance we received from every member of IWF from whom it was sought.

Mark Hedley
(Chair)

30th January 2023