



United Kingdom  
Delegation to the  
Council of Europe

18 rue Gottfried  
67000 Strasbourg  
France

Tel: +33 (0) 3 88 35 00 78  
Fax: +33 (0) 3 88 36 74 39  
[www.fco.gov.uk](http://www.fco.gov.uk)

**FROM THE PERMANENT REPRESENTATIVE**

Mr Thorbjørn Jagland  
Secretary General  
Council of Europe

27 May 2016

Dear Secretary General,

**COMPARATIVE STUDY ON BLOCKING, FILTERING AND TAKE DOWN OF  
ILLEGAL INTERNET CONTENT**

Thank you very much for sending a copy of the “Comparative Study on Blocking, Filtering and Take Down of Illegal Internet Content” report. I thought that it would be helpful to respond on behalf of the United Kingdom and make some observations.

I would first like to express my thanks to the Council of Europe for commissioning this study and to the Swiss Institute of Comparative Law (SICL) for their excellent work in conducting and delivering this project.

The United Kingdom has a strong independent media and a democratic political system which combine to ensure that there are no government restrictions on access to the Internet. Individuals and groups routinely use the Internet to exercise this freedom and express a wide range of views. The accelerated development of the internet provides unlimited opportunities to connect people across the globe and has grown to become an integral part of daily life.

In addition to the many opportunities the internet provides, sadly it also has the capacity to attract a dark element of society who wish to exploit it negatively for personal gains. It is why we have a responsibility to ensure that we remain vigilant, identify and are able to tackle such threats.

The United Kingdom Government is concerned about the proliferation of illegal activity online. The organisation of terrorist activity, and the threat that this poses to the safety and security of citizens, is a particular concern, as is child sexual exploitation. The Government would welcome industry being further incentivised to take more responsibility for the content on their networks, particularly in relation to detecting, preventing and reporting certain high threshold illegal activity, including terrorist and Child Sexual Exploitation content, where this breaches their own terms and conditions.

On the takedown of terrorist-related content, the report generally focuses on powers available under Terrorism Act (TACT) 2006 whereas in fact, this is a power that has not been used. All removals of terrorist-related content are achieved through voluntary means with Communication Service Providers (CSPs) for breaching their own terms and conditions. The dedicated police Counter Terrorism Internet Referral Unit (CTIRU) are responsible for referring content that they assess as contravening UK terrorism legislation to CSPs.

The Internet Watch Foundation removes images of child abuse as reflected in the report. However, in addition to this, the Government is working with industry to make the internet a safer place for children and young people. For example, Google have introduced changes which make it significantly harder to find child sexual abuse material online. Using new technology, they have experienced a significant reduction in search attempts over an 18 month period.

Through WePROTECT, launched by the Prime Minister in December 2014, the Government is actively working with countries, companies and civil society organisations to develop a coordinated global response. The Abu Dhabi Summit last November secured a wider global reach for WePROTECT, with new countries from the Middle East and Latin America and, for the first time, China. There are now 63 countries and international organisations signed up to the WePROTECT commitments which include agreement on taking coordinated national action against online child sexual exploitation, guided by the WePROTECT Model National Response.

I wanted to point out that the commitment by Internet Service Providers (ISPs) to offer an unavoidable choice on voluntary adult content filtering, was made in 2013 rather than 2011 as mentioned in the report. The Office of Communications (Ofcom) reported last year that 1 in 4 parents of children aged 5-15 use network-level filters provided by an ISP. More importantly, they report a very high level of satisfaction with the use of filters.

You may also be interested to know that the Police Intellectual Property Crime Unit (PIPCU), based within the City of London Police force tackles serious and organised online intellectual property crime (piracy and counterfeiting) with a focus on offences committed using an online platform. A key part of this unit's work is taking down illegal material (counterfeit or pirated goods and content).

In conclusion, I would like to thank you once again for conducting this study and stress that the United Kingdom Government is fully dedicated to ensuring that the internet is an environment which is safe and secure, and where people enjoy the limitless opportunities without exposure to illegal, obscene and harmful content.

*Christopher Yvon*