

Online Harms White Paper: National Suicide Prevention Leadership Group response

About the National Suicide Prevention Leadership Group (NSPLG)

The National Suicide Prevention Leadership Group in Scotland was established by the Scottish Government in August 2018. We are made up of representation from Scotland's third sector, health sector, emergency services, local and national government and from people with lived experience of suicide (*see table 1 for full membership*).

We are an independent advisory group that reports to Scottish Ministers and also the Convention of Scottish Local Authorities (COSLA) on matters relating to local government. We are responsible for helping to drive implementation of Scotland's Suicide Prevention Action Plan and promote strategic change to reduce deaths by suicide in Scotland. Scotland's Suicide Prevention Action Plan, published last year, sets out an ambitious target of reducing deaths by suicide in Scotland by 20% by 2022. The Action Plan sets out a number of actions to achieve this vision including:

- Supporting the development and delivery of local prevention plans
- Developing and delivering refreshed suicide prevention training to health professionals and other targeted sectors
- Developing best practice to support people in crisis and people bereaved by suicide
- Developing a system of review into all deaths by suicide
- Supporting the delivery of innovations in digital technology to improve suicide prevention.

We aim to work in collaboration with national and local partners to influence change, remove barriers, ensure progress against the Action Plan and ultimately work towards a Scotland where fewer people die by suicide.

Read our full terms of reference [here](#).

National Suicide Prevention Leadership Group membership

- Rose Fitzpatrick CBE, QPM (Chair)
- James Jopling, Executive Director for Scotland, Samaritans
- Toni Giugliano, Policy and Public Affairs Manager, Mental Health Foundation
- Nigel Henderson, Chief Executive, Penumbra
- Billy Watson, Chief Executive, SAMH
- George Dodds, Director of Health Equity and Director of Health and Work, NHS Health Scotland
- Dr Michael Smith, Lead Associate Medical Director, NHS Greater Glasgow Clyde CE and IJB rep
- Jane O'Donnell, Head of Service Policy, COSLA
- Angela Scott, Chief Executive, Aberdeen City Council
- Ruth Moss, Lived Experience, nominated via the Alliance
- Lara McDonald, Young Person Representative, nominated via Young Scot
- Dr David Hall, Royal College of Psychiatrists

- Dr John Mitchell, Principal Medical Officer Psychiatry, Scottish Government
- Nicky Reid, Scottish Professional Football League Trust
- Chief Superintendent John McKenzie, Police Scotland
- Dr Amy Knighton, Royal College of GPs

Introduction

We welcome the White Paper's recognition of the powerful role online spaces and content plays in our everyday lives and the wide-ranging implications for safety and wellbeing. While digital technology continues to transform our daily lives and bring a myriad of benefits, we recognise that harmful online behaviour and content may pose a growing challenge to users' safety & wellbeing, particularly to vulnerable group such as young people. We also recognise that this is an emerging issue, on which definitive research has not yet been conducted to establish the difference between "safe" and "harmful" content or a causal link between online content and harm, and that some of our members are still developing our views on the issue of online harm.

We recognise the scale of the challenge faced by any future regulator to identify and respond to a wide range of harmful content and behaviour in a way that is appropriate, proportionate and effective. The White Paper seeks to address a wide range of harms; some with clear, legal definitions, others which fall into a grey area which while not illegal may still have serious implications for safety and wellbeing.

As Scotland's collective voice for suicide prevention, we have focussed our response on how a future regulatory framework can address content relating to suicide and self-harm and support suicide prevention.

Suicide and self-harm is a particularly challenging area to regulate in a manner that is effective, proportionate and sensitive to the needs of users. The interaction between suicide, self-harm and online activity is complex, and requires further research to inform prevention.

We welcome steps to ensure companies remove content that is generated with a clear purpose of encouraging self-harm and suicide and, in particular content which provides detailed information on method. We recognise that content which appears to glamourise or normalise suicide and self-harm, even where it is not posted with the intent of encouraging others to take those actions, may have harmful consequences particularly for young and vulnerable users.

But we also recognise people may share content relating to suicide and self-harm as a way of sharing their own experiences or struggles and that online discussion can provide a valuable source of peer support. It is therefore essential that any regulatory framework is sensitive to the potentially complex relationship between suicide, self-harm and online interaction, ensuring that steps to protect users don't inadvertently entrench stigma and discourage safe and open discourse & peer support online.

Suicide, self-harm and the internet

It is well established that self-harm is one of the strongest predictors of suicide¹; content & behaviour that appears to promote & glamourise self-harm may have serious implications for suicide prevention, both on

¹ Hawton, D. Zahl, and R. Weatherall, [Suicide Following Deliberate Self-Harm: Long-Term Follow-up of Patients Who Presented to a General Hospital](#). The British Journal of Psychiatry: The Journal of Mental Science 182, no. Journal Article (2003): 537–42.

and offline. Existing evidence suggests that interaction between internet use, online content, and suicidality is complex².

Content which promotes a novel or specific method of suicide poses a particular risk, as evidence shows where a novel suicide method become better known, suicides using that method increase³. This does not correlate with a decrease in other methods, ultimately leading to an increase in overall deaths. Any future regulator must have powers to identify and remove this content.

Research shows broader content which provides information on methods of suicide or promotes or glamourises suicide and self-harm can be harmful for vulnerable users⁴. The dangers posed by this type of content is more contextual and dependent on individual users - not everyone will react to content in the same way.

In a population survey of 21 year olds, of the 248 participants who had made suicide attempts (6% of the overall sample), almost three quarters reported some kind of suicide-related internet use at some point⁵. One in five has accessed sites giving information about how to hurt or kill yourself, though most also reported visiting help sites. Interviews with affected young people found that some felt such content validated or legitimised suicide as a course of action. A study of self-harm among adolescents in Northern Ireland found around 1 in 5 cited the internet or social media use as a factor that influenced their decision to self-harm⁶.

However, research also highlights the positive role internet use can play in encouraging users to seek help and access support. The same study of 21-year-olds found that most users (81%) who access harmful online content relating to suicide and self-harm, also accessed help sites. The research also highlighted the importance for sites offering help and support to be relevant and responsive to users' needs. For many online discussions of suicide and self-harm provides a vital lifeline for sharing experiences and peer support. Open and honest discussion plays an important role in addressing stigma and encouraging help-seeking.

Further study is required to better understand the relationship between online activity and content and suicide and self-harm, the difference between "safe" and "harmful" content and how online spaces can encourage safe discussion and promote peer support & help-seeking.

Current responses harmful content & behaviour

We recognise the scale of the challenge; content promoting suicide & self-harm is wide-spread, across a range of platforms and channels, many of which are hosted outside the UK.

Individual companies and platforms are starting to take welcome steps to restrict access to harmful online content and to promote online support to users who may be vulnerable. This includes mechanisms for reporting content and automated support messages for users who search content related to suicide & self-harm. Some of the leading internet companies have pledged to work in partnership with the government,

² Dr Lucy Biddle, Dr Jane Derges, Prof David Gunnell (University of Bristol) Dr Stephanie Stace, Jacqui Morrissey (Samaritans) [Priorities for suicide prevention: balancing the risks and opportunities of internet use](#). Policy Report 7/2016

³ Dr Lucy Biddle, Dr Jane Derges, Prof David Gunnell (University of Bristol) Dr Stephanie Stace, Jacqui Morrissey (Samaritans) [Priorities for suicide prevention: balancing the risks and opportunities of internet use](#). Policy Report 7/2016

⁴ Dr Lucy Biddle, Dr Jane Derges, Prof David Gunnell (University of Bristol) Dr Stephanie Stace, Jacqui Morrissey (Samaritans) [Priorities for suicide prevention: balancing the risks and opportunities of internet use](#). Policy Report 7/2016

⁵ Ibid

⁶ Rory C. O'Connor, Susan Rasmussen, Keith Hawton [Adolescent self-harm: A school-based study in Northern Ireland](#). [Journal of Affective Disorders](#) 159 (2014) pp 46–52

the third sector, industry experts and users, supporting research to improve our understanding of the interactions between internet use, suicidal behaviour and self-harm and inform best practice guidelines.

We welcome these initial steps, but believe they do not go far enough to meet the scale of the challenge. Self-regulation has resulted in inconsistent approaches to protecting users' safety and wellbeing across platforms, a lack of transparency and information-sharing and limited incentives to address industry-wide structural problems or take a proactive approach to reducing online harm. **Developing a regulator that is fit for purpose**

As the online environment has relied largely on self-regulation, developing a new regulatory framework means starting largely from a blank slate. It is therefore essential that this framework is developed in consultation, not only with the industry itself, but with relevant stakeholders including third sector, health and emergency services, and - most importantly - users themselves.

Given the diverse range of harms the White Paper seeks to address; any future regulatory framework cannot take a one size fits all approach. Some of the harms outlined in the White Paper already have a clear legal definition. Others, like content relating to suicide and self-harm, are less clearly defined and may be more dependent on context. This is an area that therefore requires further research and a tailored response, informed by insight from the academic, health and third sectors and from users themselves - particularly users with lived experience of suicide and self-harm.

Given the constantly changing nature of the online environment, any future regulator must be responsive to emerging threats and developing trends. Powers of enforcement must be proportionate to the scale of the challenge and empower the regulator to respond effectively and timeously to breaches.

A future regulatory framework should not focus solely on reactive measures such as the removal of harmful content, but incentivise companies to address structural problems and explore how they can embed safety into design and delivery of their products and services. Scotland's Suicide Prevention Action Plan commits to exploring how digital innovation can support prevention and we welcome the White Paper's recognition that technology has a positive role to play in promoting safety and wellbeing.

But we must also recognise that online regulation cannot be viewed in isolation. To achieve our ultimate aim of reducing deaths by suicide, regulation and innovation online must be matched with commensurate action offline to address the wider social, health and economic factors that contribute to suicide and ensure appropriate and timely support is available to anyone who needs it.

Key recommendations

- Regulation to address online content & activity relating to suicide and self-harm requires a tailored, evidence-based approach informed by ongoing research and sector representation.
- Research should be undertaken into any causal relationship between online content and suicide and self-harm: this research should inform the definition of 'harmful content' in relation to suicide and self-harm.
- Best practice must consider how companies can reduce the prevalence of harmful content while maintaining safe spaces for users to share their experiences and supporting both users who post and search for this content.
- When content is removed from a person's social media account, there must be a proactive approach taken to ensure the person is effectively signposted to support for their mental health.

- Regulation must recognise the complexity of suicide and self-harm and ensure that steps to reduce the prevalence and impact of harmful content do not have the unintended consequence of reinforcing stigma and discouraging discussion and help-seeking.
- There must be a recognition that talking about suicide does not increase suicide risk; an awareness of the importance of open discussion about suicide should be coupled with an active effort not to reverse the progress that has been made in encouraging people to be open about their mental health in bringing forward regulation.
- Content which promotes and provides detailed information on specific or novel methods of suicide must be identified and removed as matter of urgency.
- A future regulatory framework must include meaningful measures and reporting requirements on the prevalence of harmful content relating which promotes or glamourises suicide & self-harm and the efficacy of companies' own procedures for flagging, removing and blocking this content and for supporting & signposting users.
- A regulatory framework should take a holistic approach. Rather than focussing solely on reactive measures such as the removal of harmful content a future framework should include proactive measures to encourage & support companies to embed safety within the design and delivery of online spaces and services.
- A future regulatory framework must take meaningful steps to address the balance of power between users and internet companies and platforms, through timely and accessible complaints procedures. This should include access to a 'super complaints' process to address structural problems within the industry.
- Ongoing oversight of the work of the regulator, including development of codes of practice, must be informed by expertise from relevant stakeholders and developed in consultation with users, particularly users with lived-experience of suicide and self-harm. It is vital that young people voices play meaningful role throughout this process.

Consultation questions

Section 1: Transparency and user complaints

- 1. This government has committed to Annual Transparency Reporting. Beyond the measures set out in this White Paper, should the government do more to build a culture of transparency, trust and accountability across industry and, if so, what? Please explain your answer in the box provided.**

Transparency is key to effective regulation. A lack of openness and information-sharing poses a significant barrier to understanding the prevalence and impact of content relating to suicide & self-harm, scrutinising companies' internal processes for flagging, reporting & removal, and developing evidence-based best practice to reduce harmful content & support users.

Future reporting requirements should include:

- detailed information on the types of harmful content hosted on the site
- processes and timeframes for identifying, reporting and removing harmful content
- processes & timeframes for responding to complaints
- mechanisms for providing support and signposting

Effective regulation requires increased openness around the mechanisms by which companies promote and target content to users, particularly groups who may be more vulnerable such as children and young people.

In addition to annual reporting requirements we support the recommendation that the regulator should have the power to conduct thematic reviews into specific areas of concern and request additional data. This would be particularly valuable in areas like self-harm and suicide where existing data is limited and where more in-depth research is needed to inform our understanding of helpful and harmful content and the relationship between internet use, self and harm and suicide, which will in turn inform effective regulation.

2. Should designated bodies be able to bring ‘super complaints’ to the regulator in specific and clearly evidenced circumstances?

We support the recommendation to establish a super complaints process. A super complaints procedure will not only provide a vital additional source of protection to users, but allow relevant stakeholders, with expertise in a specific area to identify areas where companies are failing to adequately address harmful content & behaviour. This will support the regulator to effectively and efficiently identify and respond to structural and emerging problems.

There should also be a clear process for individuals to bring complaints where companies internal processes have failed to provide adequate redress. It is currently unclear in the White Paper whether the super complaints process is intended to cover both complaints brought by stakeholders and by individuals - greater clarity on the complaints process and mechanisms for both these groups is required.

3. What, if any, other measures should the government consider for users who wish to raise concerns about specific pieces of harmful content or activity, and/or breaches of the duty of care?

A regulatory framework should recognise and take steps to address the balance of power between internet companies and users.

This should include placing requirements on internet companies to provide clear and accessible information about users’ rights, the types of content and behaviour internet companies deem harmful or unacceptable, and how users can flag, block, request removal of content and make complaints. The regulator should set standards for and require companies to report on the quality and timeliness of their complaints process.

In addition to providing clear and accessible information regarding their own complaints procedures, companies should be required to clearly signpost to external, independent complaints procedures.

Processes to protect individual users should be reinforced by mechanisms for professionals and expert organisations to raise concerns about content, so that these can be quickly addressed by platforms. This

feedback loop would also help charities, government and the regulator to identify sector-wide issues or breaches of the duty of care.

4. What role should Parliament play in scrutinising the work of the regulator, including the development of codes of practice?

Oversight from Parliament is essential to ensure public trust in the regulator. Parliament should play an active role in determining the regulator's scope, functions and codes of practice.

However, establishing a robust and effective regulatory framework and ensuring the regulator's remains responsive to users' needs and to developing challenges, requires wider and ongoing consultation and input from relevant stakeholders and users themselves.

The Government should ensure that the regulator is responding adequately to the problems faced by service users. In many regulated markets, this is done through a 'tripartite' structure comprising regulator, redress scheme and user advocate. Such a structure would facilitate collaboration and data sharing between these bodies, support the regulator to identify sector problems early and reduce the risk of systematic harm.

Given the range of harmful content and activity the White Paper seeks to address, it is essential that codes of practice are informed by evidence and expertise from relevant sectors to ensure measures are appropriate and effective in addressing specific harms and meeting users' needs.

A user advocate panel, with representation from expert bodies working across different areas of harm, would offer an additional source of oversight, supporting the regulator to identify and respond to sector-wide problems and developing trends.

Section two: Activities in scope of regulation

5. Are proposals for the online platforms and services in scope of the regulatory framework a suitable basis for an effective and proportionate approach?

Yes; we believe the regulatory framework is proportionate to the scale of the challenge. It is vital the future regulator has the relevant expertise, resources and powers to effectively address harmful online content and protect users, particularly young people.

6. In developing a definition for private communications, what criteria should be considered?

We welcome the White Paper's recognition that that online interactions are complex and that the boundary between private and public channels is increasingly blurred.

Much of the content promoting or glamorising suicide or self-harm, that we are aware of, exists in the public domain. It is this widespread dissemination of harmful material to potentially vulnerable people that is of most concern regarding the increased risk and spread of suicidal behaviour.

But as major players in the online environment, like Facebook, move towards increased use of closed groups, forums and encryption we recognise private communication may pose a growing challenge for balancing users' safety with the ability to express their feelings and seek help. It is therefore essential that any future regulatory framework and regulator are informed by expertise in how social media and online interactions are likely to change and develop in the coming years, and are sufficiently agile to respond to emerging challenges.

7. Which channels or forums that can be considered private should be in scope of the regulatory framework?

We agree that caution is required to ensure any future regulator takes a balanced and proportionate response to protecting users' privacy and safety. Closed groups and forums, which may have many hundreds or thousands of members, clearly stretch the definition of private communications, and may create spaces where harmful content could be shared, unchecked, putting users at increased risk. However, we also acknowledge the potential of closed channels and forums to provide peer support and encourage help-seeking among vulnerable people.

Criteria and guidance around private versus public communication should be developed in line with stakeholders and users, in particular users who have lived experience of suicide, self-harm or mental health and who use closed groups or forums as a support mechanism.

7a. What specific requirements might it be appropriate to apply to private channels and forums in order to tackle online harms?

For practical reasons and for reasons of privacy, there will, as the White Paper acknowledges, always be private communications which require a different approach to public ones. In some cases, though, it will nonetheless be possible to highlight sources of support.

For example, a service may be knowingly providing encrypted forums or groups which facilitate the discussion of self-harm. Without intrusively monitoring the groups, it may still be possible to ensure information about the support that is available prominent in the design of their website or application. Platforms' own guidelines for how users create and run closed groups and forums can also play a role in educating users about harmful content and supporting users to create safe online spaces.

Further research is needed to explore the potentially positive role private channels can play in encouraging help-seeking and sign-posting, and how platforms can embed mechanisms to promote safety the design and delivery of products & services that facilitate private and public communication.

Section three: the regulator and its approach

8. What further steps could be taken to ensure the regulator will act in a targeted and proportionate manner?

The online environment has historically been under-regulated, relying largely on internet companies' internal policies. In developing a new, regulatory framework, that is capable of meeting the scale of existing & future challenges, the Government must work with industry, relevant stakeholders and users themselves.

In the case of content relating to suicide and self-harm, it is particularly important to engage with users who have lived experience of these issues to develop a framework that protects & supports users without re-enforcing stigma and discouraging people from sharing their experiences online.

The regulator should work with industry and partners in the health and third sectors to develop effective mechanisms for tracking content related to suicide & self-harm in order that we can understand how online and activity & content related to these issues changes over time, and how effective action to prevent its potential harmful effects is. There should be regular data-sharing between regulator, user advocate and an independent complaints body to triangulate the problems in the sector.

The regulator should be supported by a specialist user-advocate or advisory panel function providing ongoing expertise and oversight on challenges and emerging trends around specific harms. This additional expertise is

particularly vital in connection with content & activity relating to suicide and self-harm, where the role of internet use & online content is complex and requires further research to inform prevention. The regulator has a role in dealing with structural concerns which may arise from this.

There should be transparent internal complaints processes set by and enforced by the regulator. When a platform does not follow their complaints process, or a user is dissatisfied, there should be an independent non-court-based route that can quickly reach a resolution and require the platform to take action or explain why no action is needed. If the platform does not comply, then a robust enforcement process should begin.

9. What, if any, advice or support could the regulator provide to help businesses, particularly start-ups and SMEs, comply with the regulatory framework?

The regulator should ensure that all businesses it regulates have an understanding of the complexities around content relating to suicide and self-harm, and an understanding of what content – and what contexts – are most dangerous. This may in practice need to be provided by a third party organisation or organisations.

The Government should fund the production of best practice standards on self-harm and suicide online content. Existing guidelines, created around reporting of suicide, which are now recognised and supported across the media sector could provide a helpful reference point of this work. However, it is important these guidelines reflect the unique challenges posed by the online environment, where content is often user-generated, and that they balance users' safety with the right to individual expression.

Best practice standards would provide businesses with a guide to creating safe spaces online, which minimise the risk of harm and maximise the opportunity for supportive, safe and helpful content, balanced with the individual's right to discuss their own experiences. These best practice standards should be based on the best available evidence and consultation with users and industry. They should be rolled out as a priority and monitored regularly to test compliance over time.

10. Should an online harms regulator be: a new public body or an existing public body?

Given the scale of the challenge facing a future regulator, we believe this role should be filled by a new public body. Any future regulator will require expertise on the technology environment and be agile enough to adapt to its constantly-changing landscape. In addition, the regulator will require expertise across a diverse range of online harms, each requiring a tailored approach.

11. A new or existing regulator is intended to be cost neutral: on what basis should any funding contributions from industry be determined?

The NSPLG does not have a view on how the Government should do this.

Section four: enforcement

12. Should the regulator be empowered to i) disrupt business activities, or ii) undertake ISP blocking, or iii) implement a regime for senior management liability? What, if any, further powers should be available to the regulator? Please explain your answer in the box provided.

Yes, we believe that the future regulator will require meaningful powers of enforcement to ensure it can respond to breaches and emerging threats, incentivising companies to fulfil their obligations quickly effectively.

We recognise that the existing liability regime means internet companies only have a legal duty to remove illegal content once they become aware of it. This creates little incentive for companies to take proactive action to identify and remove harmful content or make systematic improvements in governance and risk management to address structural failings across the industry.

A future regulatory framework should take a broader approach to addressing harmful online content and activity, that incentivises companies to take a proactive approach to reducing the risk and impact of harmful content & activity and embedding safety into the design and delivery of their services.

We welcome the White Paper's recognition that enforcement powers should allow for a flexible approach, so that sanctions are proportionate to the potential and actual damage caused and to the companies reach, size and revenue.

We agree that the most disruptive sanctions - such as disruption of business activity, ISP blocking, and senior management liability - should be reserved for the most serious breaches, which pose a significant risk to safety and where companies have repeatedly failed to comply. All sanctions should be applied in line with the ECHR Article 10 protections for freedom of information & speech.

13. Should the regulator have the power to require a company based outside the UK or EEA to appoint a nominated representative in the UK or EEA in certain circumstances? Please explain your answer in the box provided.

We welcome the White Paper's recognition that effective regulation of harmful online activity & content will require an international approach. A huge volume of content which promotes suicide and self-harm originates outside of the UK and be hosted by companies and platforms which may have not have a legal presence in the UK.

Effectively managing this harm will require an international approach. We agree the regulator's enforcement powers must extend to companies who do not have legal presence in the UK, including blocking access to platforms as an absolute last resort. We would welcome creating a duty for companies based outside of the UK to appoint a representative responsible for enforcing compliance and working with the regulator, following a similar approach to the model used for GDPR compliance.

The White Paper states its ambition for the UK to become a world leader in internet safety; this will require a collaborative, multinational approach. Recognising the global impact of harmful online content and activity, it is important any future regulator works closely with international counterparts to share information and good practice, helping to identify emerging threats and challenges.

14. In addition to judicial review, should there be a statutory mechanism for companies to appeal against a decision of the regulator, as exists in relation to Ofcom under sections 192-196 of the Communications Act 2003?

An accessible and effective system of review is important to ensure the industry and general public has confidence that the regulator is acting fairly and proportionately, within its powers.

Section five: technology as part of the solution

15. What are the greatest opportunities and barriers for (i) innovation and (ii) adoption of safety technologies by UK organisations, and what role should government play in addressing these?

Addressing suicide and self-harm should not rely solely on blocking and removing harmful content. There are significant opportunities for technology to play a valuable role in supporting suicide prevention and promoting safety, by encouraging help-seeking and signposting to support.

There are already some positive examples of this; Facebook, Twitter and Instagram have developed pop-up messages that appear when users search for terms like suicide or self-harm and mechanisms by which users can flag that they are concerned about another person's wellbeing. However, these mechanisms vary across platforms and there is currently limited evidence on how effective different approaches to intervention are.

More research and investment is required to improve our understanding of how people use the internet when they are feeling suicidal or experiencing distress and what forms of intervention and support are most effective for users at these times.

Given the constantly changing nature of the online environment, research is also vital to ensure support mechanisms keep pace with changes in online behaviour - for example the shift towards private communication and closed forums.

A regulatory framework should include mechanisms to support and incentivise innovation, encouraging companies to take a proactive approach to embedding safety and support into the design and delivery of products & services.

16. What, if any, are the most significant areas in which organisations need practical guidance to build products that are safe by design?

We recognise that content relating to suicide & self-harm is one of the less clearly defined harms addressed by the White Paper and an area where further research and expert insight is required.

We support a precautionary approach when it comes to the removal of harmful content, recognising that many people share this content as a means of expressing their own experiences & struggles and seeking peer support. It is vital that regulation does inadvertently increase stigma around mental health by discouraging people to talk and share openly.

Best practice around identifying the types of content which may cause harm and supporting users who share and search for this content must be informed by expertise from the third sector, health professionals, academics, and, most vitally, users with lived experience of suicide, self-harm and mental health.

Evidence-based guidance should include practical information on the types of terms & content people search for when they are suicidal or distressed, what messages and support they respond to and how these can be tailored to meet the needs of different audiences. A future regulator should take steps to facilitate and encourage the sharing of knowledge and data, supporting internet companies to embed safety within design & delivery of products.

Section six: empowering users

17. Should the government be doing more to help people manage their own and their children's online safety and, if so, what? Please explain your answer in the box provided.

Addressing suicide and self-harm requires action on and offline. Reducing the prevalence and impact of harmful online content and embedding safety and support into the online environment are important steps but they must be part of a broader preventative approach.

This includes actions to expand and improve access to young people's mental health and support services, exploring new ways of supporting people in distress and crisis and initiatives, such as the Distress Brief Intervention model, currently being piloted by Scottish local authorities.

Young people and their families must be supported to develop the skills they need to stay safe online, to manage their emotional wellbeing and to seek help when they need it. This will all need to be underpinned by efforts to change wider societal attitudes towards self-harm and young people, and effective action on the underlying risk factors for self-harm in young people.

Many of these broader actions involved devolved areas of policy and there are significant opportunities for the Scottish Government to support young people's online safety and emotional wellbeing through delivery of reformed personal and social education and reforms to children and young people's mental health services in Scotland. Scotland's Minister for Mental Health has committed £90,000 to developing new guidance and advice around young people's social media use.

We would welcome increased sharing of knowledge and best practice between devolved governments and services to inform a broader preventative approach to protecting young people on and offline.

18. What, if any, role should the regulator have in relation to education and awareness activity?

Education is essential to ensure the success of any future regulatory framework. Users must be supported to understand how they can stay safe online and to be aware of their rights and the responsibilities internet companies must meet. The regulator has an important role to play in raising awareness and educating the public.

There is an urgent need for independent information and resources about online content for users. Developing and maintaining an independent open cross sector resource for members of the public concerned about online content, with advice on what to do about it, should be an early priority.

As education and public health are devolved in Scotland, Wales & Northern Ireland, we would encourage the regulator to work collaboratively with devolved departments and agencies to ensure resources and information are relevant to each nation and that opportunities to support relevant national initiatives are maximised.