ISOC UK England Chair's Report for 2024

Introduction

The Internet Society UK England Chapter has had an impactful and dynamic year in 2024.

Our policy activities have focussed on advocating for digital rights, contributing to critical legislative processes, and enhancing online child safety. This report provides a detailed overview of five significant events and initiatives undertaken by our chapter, demonstrating our ongoing commitment to promoting an open, secure, and inclusive internet.

Just like in 2023, whilst the Chapter was active in policy, with a core number of people frequently helping out with research and drafting, thanks for the call for comments we have sent to our Policy mailing list, we were unable to hold face to face meetings, mostly due the very busy calendar of both our workshop proposers and the panellists they wanted to invite. With many topics advancing at fast speed, the Chapter has taken part in ISOC HQ organised calls for the whole Internet Society community and we hope that our members have benefited from taking part in these calls as a whole. It is also worth noting that most of these calls are recorded and we are aware that many people are watching the calls later. To consult the huge library of Internet Society video Content, go to https://isoc.live/

Policy

Key Focus Areas

- 1. Joint Briefing on the Investigatory Powers Act Bill to the House of Lords
- 2. Joint Submission of Evidence to the Joint Committee on Human Rights on the Investigatory Powers Act Bill
- 3. Joint Submission of Evidence to the House of Commons Public Bill Committee on the Investigatory Powers Act Bill
- 4. Joint Cross-Sectoral Statement on the Investigatory Powers Act Bill
- 5. Response to OFCOM Consultation on Child Safety
- 6. Open Letter to EU Commissioner-designate Preserving the Open Internet

1. Joint Briefing on the Investigatory Powers Act Bill to the House of Lords

Overview: In January 2024, our chapter collaborated with other organisations to provide a joint briefing to the House of Lords regarding the Investigatory Powers Act Bill (IPAB). The objective of this briefing was to present a thorough analysis of the Bill's implications for privacy and civil liberties and to propose amendments that would enhance the Bill's alignment with human rights standards.

Full details of the contribution have been published on the Chapter's "Joint Briefing on Investigatory Powers (Amendment) Bill [HL]" Web page.

Key Contributions:

- Detailed Analysis: Our briefing highlighted specific areas of concern within the IPAB, such as the broad surveillance powers granted to government agencies and the potential for misuse of these powers. We emphasised the need for clear definitions and limitations to prevent overreach.
- Recommendations: We proposed several amendments to the Bill, including the establishment of robust oversight mechanisms, increased transparency, and enhanced protections for individuals' privacy rights.

• Stakeholder Engagement: The briefing was the result of extensive collaboration with various stakeholders, including privacy advocates, legal experts, and civil society organisations. This ensured that our recommendations were well-informed and representative of diverse perspectives.

Impact: The joint briefing received significant attention from the House of Lords, and several of our recommendations were considered for inclusion in the final version of the IPAB. This event demonstrated the effectiveness of collaborative advocacy in influencing legislative processes and protecting digital rights.

2. Joint Submission of Evidence to the Joint Committee on Human Rights on the Investigatory Powers Act Bill

Overview: Our chapter participated in a joint submission of evidence to the Joint Committee on Human Rights (JCHR) regarding the IPAB. This submission aimed to ensure that the Bill adhered to international human rights standards and provided adequate safeguards for privacy and civil liberties.

Full details of the contribution have been published on the Chapter's "<u>Joint submission of Evidence</u> to Joint Committee on Human Rights" Web page.

Key Contributions:

- Human Rights Focus: We emphasised the importance of aligning the IPAB with international human rights norms, such as those outlined in the European Convention on Human Rights. Our submission detailed how certain provisions of the Bill could potentially violate these standards.
- Evidence-Based Arguments: Our submission was supported by robust evidence, including legal analyses, case studies, and expert testimonies. This provided a strong foundation for our recommendations and highlighted the potential risks associated with the Bill's current provisions.
- Collaborative Effort: The joint submission was developed in collaboration with several other organisations, ensuring a comprehensive and well-rounded perspective on the Bill's implications.

We recommended that the Committee put forward the following amendments:

- 1- To include explicit safeguards (such as prohibition on systemic vulnerabilities) to prevent unsafe use of the resulting powers.
- 2- To require that impact assessments on fundamental rights and privacy are conducted and properly reflect the legitimate interests of all stakeholders.
- 3- To prohibit the issuing of notices that would allow general monitoring.
- 4- to require that Internet impact assessments are conducted for this revision, given the intersection between critical properties of the Internet and the exercise of human rights.
- 5- 1. To ensure that operators are not required to comply with a notice until objections to it have been resolved.
 - 2. To ensure that objections made by an operator go through an independent appeals process.
 - 3. To ensure that any revision of the IPA demonstrates how its operation and enforcement will comply with the necessity and proportionality requirements.

Impact: The JCHR acknowledged our submission and recognized the importance of considering human rights implications in the legislative process. Our contributions helped to raise awareness about the need for greater transparency and accountability in the IPAB, ultimately leading to more informed discussions and potential amendments.

3. Joint Submission of Evidence to the House of Commons Public Bill Committee on the Investigatory Powers (Amendments) Bill

Overview: As part of our advocacy efforts, the Internet Society UK England Chapter contributed to a joint submission of evidence with the **Internet Society** and **Access Now** to the House of Commons Public Bill Committee on the IPAB. This submission, sent on 7 March 2024, focussed on the practical implications of the Bill and the need for clear guidelines to prevent misuse of surveillance powers.

Full details of the contribution have been published on the Chapter's "Joint submission of Evidence to House of Commons Public Bill Committee" Web page.

Key Contributions:

- Proportionality and Necessity: Our submission emphasised the principles of proportionality and necessity, arguing that surveillance measures should be strictly limited to what is necessary to achieve legitimate aims. We called for clear criteria to ensure that surveillance powers are not used excessively or arbitrarily.
- Practical Concerns: We highlighted several practical concerns, such as the potential impact on technological innovation and the risk of undermining public trust in digital services. Our submission included recommendations for mitigating these risks, such as enhanced oversight and transparency measures.
- Stakeholder Perspectives: The joint submission incorporated insights from various stakeholders, including technology companies, privacy advocates, and legal experts. This ensured a balanced and comprehensive analysis of the Bill's potential impacts.

Impact: The House of Commons Public Bill Committee acknowledged our submission and engaged in meaningful discussions about the practical implications of the IPAB. Our contributions helped to inform the committee's deliberations and fostered a more nuanced understanding of the Bill's potential effects on privacy and innovation.

4. Joint Cross-Sectoral Statement on the Investigatory Powers (Amendments) Bill

Overview: On 22 March 2024, the Internet Society UK England Chapter, along with other organisations, issued a joint cross-sectoral statement on the IPAB. This statement aimed to raise public awareness about the Bill's potential implications and to advocate for amendments that would protect privacy and civil liberties.

Full details of the contribution have been published on the Chapter's "Joint cross-sectoral statement: Concerns Regarding the Investigatory Powers (Amendment) Bill" Web page.

Key Contributions:

- Public Awareness: The joint statement was widely disseminated through various channels, including social media, press releases, and public forums. This helped to raise awareness about the potential risks associated with the IPAB and encouraged public engagement in the legislative process.
- Unified Voice: The statement represented a unified voice from a diverse range of stakeholders, including civil society organisations, technology companies, and privacy advocates. This demonstrated widespread concern about the Bill's implications and reinforced the call for amendments.
- Recommendations: The statement included specific recommendations for improving the IPAB, such as enhancing oversight mechanisms, increasing transparency, and ensuring that

surveillance measures are proportionate and necessary. It warned about over-reaching of some parts of the Bill such as:

- permitting the harvesting and processing of internet connection records (meta-data) for generalised, massive surveillance;
- weakening safeguards when intelligence services collect bulk datasets of personal information, potentially allowing them to harvest millions of facial images and social media data;
- expanding the range of people who can authorise the surveillance of parliamentarians;
- forcing any technology company conducting business in the UK, to inform the government of
 any plans to improve security or privacy measures on their platforms. This would result in
 the Government being able to issue a notice to prevent such changes thus weakening
 security of services on the Internet.

Impact: The joint cross-sectoral statement received significant media coverage, having been picked up by the BBC online News and contributed to a broader public dialogue about the IPAB. It helped to mobilize public opinion and encouraged lawmakers to consider the proposed amendments. This event showcased the power of collective action in influencing legislative processes and protecting digital rights.

5. Response to OFCOM Consultation on Child Safety

Overview: In July 2024, the Internet Society UK England Chapter responded to OFCOM's consultation on child safety. Our joint submission with the Internet Society aimed to promote a balanced approach that protects children online while safeguarding privacy and freedom of expression.

Full details of the contribution have been published on the Chapter's "Joint submission of response to OFCOM consultation on Child Safety" Web page.

Key Contributions:

- The Chapter reiterated the points made in past submissions to UK consultations conducted by OFCOM but also in relation to the various legislation that went through Parliament in the first part of the year.
- In particular, the response reiterated that End-to-end encryption ("E2EE") is needed to safeguard privacy of data including the safety of children.
- It referenced several papers:
 - The Global Encryption Coalition's paper: "Guide to Encryption", published on 12 March 2024.
 - "Preemptive Monitoring in End-to-End Encrypted Services." Internet Society, July 2024, www.internetsociety.org/resources/doc/2024/preemptive-monitoring-e2ee-services/.
 - "Outside Looking in: Approaches to Content Moderation in End-to-End Encrypted Systems."
 Center for Democracy and Technology, 21 June 2023, cdt.org/insights/outside-looking-in-approaches-to-content-moderation-in-end-to-end-encrypted-systems/.
 - "Safety Tech Challenge Fund." REPHRAIN, www.rephrain.ac.uk/safety-tech-challenge-fund/.
 Accessed 11 July 2024

Impact: OFCOM acknowledged our submission and recognized the importance of a balanced approach to child safety online. Our contributions helped to inform OFCOM's deliberations and influenced the development of policies and guidelines that protect children while safeguarding privacy and freedom of expression.

6. Open Letter to EU Commissioner-designate – Preserving the Open Internet

The open letter, addressed to Commissioner-designate Henna Virkkunen, expressed concerns about ongoing efforts to undermine net neutrality principles in Europe. The letter, signed by various organisations and individuals, urged the European Commission to refrain from intervening in the commercial dynamics of the Internet's interconnection ecosystem. It highlighted the risks of proposals that would mandate payments from Content and Application Providers (CAPs) to telecommunications operators, which could lead to market fragmentation, increased costs, and degraded service quality. The letter emphasised the importance of maintaining a well-functioning market with balanced bargaining powers and called for evidence-based recommendations that supported an open Internet. The signatories believed that such regulatory interventions were unnecessary and harmful to the global Internet and its users.

Full details of the contribution have been published on the Chapter's "Open Letter to EU Commissioner-designate: Preserving the Open Internet" Web page.

Impact: reflected in POLITICO and about 5 other outlets.

Correspondence with Joint Committee on Human Rights and the Equalities and Human Rights Commission

In between submitting the above written contributions, the Chapter engaged the Chairs of the Joint Committee on Human Rights and the Equalities and Human Rights Commission.

The Joint Committee on Human Rights (JCHR) is a select committee of the UK Parliament. It consists of twelve members appointed from both the House of Commons and the House of Lords. The JCHR is responsible for examining matters related to human rights within the United Kingdom and scrutinizing every Government Bill for its compatibility with human rights.

The Equalities and Human Rights Commission (EHRC) is an independent statutory body in Great Britain, established by the Equality Act 2006. Its primary role is to encourage equality and diversity, eliminate unlawful discrimination, and protect and promote the human rights of everyone in Britain.

Our engagement with both the Committee and the Commission encouraged the efforts to defend human rights in the parliamentary legislative processes of:

- The Investigatory Powers (Amendments) Bill passed into an Act in 2024
- <u>The Data Protection and Digital Information Bill</u> stopped due to the results of the UK General Election this was a particularly controversial Bill as referenced in our <u>campaign</u> last year.

To-date, the Chapter is aware of a potential follow-up challenge to the Investigatory Powers (Amendments) Act 2024 and is being kept in the loop for any follow-up.

Other Activities: IPv6 Matrix

The IPv6 Matrix has been measuring the use of IPv6 in the world's 1 Million most popular Web Sites since 2010. The project has collected over 560Gb of data relating to the spread of IPv6 worldwide. Following the work done a few years ago to re-write the crawler and port the Seb server to Its two virtual servers (one crawler and one web server) have been running smoothly – and show a slow growth of IPv6 enabled information suppliers worldwide. https://ipv6matrix.org/

UK Internet Governance Forum- https://ukigf.org.uk/events/uk-igf-2024/

The UK Internet Governance Forum is the national internet governance forum for the United Kingdom and took place on 5 November 2024. Internet Governance Forums (IGFs) are an initiative led by the United Nations for the discussion of public policy issues relating to the internet. A key distinguishing feature of IGFs is that they are based on the multi-stakeholder model – all sectors of society meet as equals to exchange ideas and discuss best practices. The purpose of IGFs is to facilitate a common understanding of how to maximise the opportunities of the internet whilst mitigating the risks and challenges that the internet presents. The UK IGF has a steering committee and secretariat. The UK Chapter of the Internet Society is a member of the UK IGF Steering Committee.

The Chapter, as a co-organiser of the conference, had a say in organising each of the sessions. This year's IGF took place both online and in person and it was possible to invite panellists that were not necessarily located in London, and often were first timers in any Internet Governance Forum.

The Chapter demonstrated its commitment to the UK multistakeholder model that governs the UK IGF by making a successful application for events funding from the Internet Society Foundation. The Chapter paid the received sum of £2000 in full towards sponsoring the UK IGF. Whilst may seem a small amount of money for an event that costs tens of thousands of pounds to organise and host, it is hoped that the symbolism of the UK Chapter being a co-sponsor will help with finding other financial sponsor organisations in the UK for future UK IGFs.

Get involved!

Are you passionate about making the Internet a better place for everyone? The UK Chapter of the Internet Society is looking for volunteers to help us advance our mission! We focus on educational events, community programs, public policy advocacy, and networking events. Whether you're interested in Internet security, broadband access, child safety, or network neutrality, we need your skills and enthusiasm. Be an active part of a community dedicated to promoting an open, secure, and trustworthy Internet for all. Get involved today and help us make a difference. Our current project areas are listed on: https://isoc-e.org/projects/

Contact us on contact@isoc-e.org

Membership

As you know, Global Membership of the Internet Society and membership of the UK Chapter are open and free. From last year's total of 1864 members, the Chapter has now reached 1923 members, a 3% increase year on year which is very modest but not uncommon with similar organisations in the UK. Future common activities with other organisations should help this figure to rise again.

Mailing Lists

It is also time to remind you of our discussion mailing lists which are open to all - as a prime channel for you to interact with the Chapter, but also with other members in the UK.

They can be accessed on: http://lists.isoc-e.org/cgi-bin/mailman/listinfo

• **UK Policy Mailing list**: Internet Policy especially UK Internet Policy. This includes discussions on Government Inquiries, but also any Internet policy topic that is likely to affect UK Internet users and businesses. This mailing list has been the primary means of announcement of campaigns, petitions, open letters for the UK Chapter of the Internet Society to engage.

• **Open-Trust**: a discussion forum focussing on Internet Trust issues, from the Trust Issues covered globally by the Internet Society (See: https://www.internetsociety.org/issues/trust/), to the work undertaken about Trusting Platforms and Algorithms, in a world dominated by increasing Surveillance, Tracking, and, at the other end of the spectrum, Fake news.

This mailing list and group probably requires a shepherd if it is to grow, as most announcements relating to policy issues that the chapter has engaged in were made on the UK Policy Mailing list.

• ISOC-UK-Universities: a forum focussing on University and student activities. Many UK Universities now offer courses about Internet Governance, sometimes as a standalone item, sometimes as part of a wider media course, but often as a research topic. This group, still looking for a person to lead it, is a channel for interaction on issues that young members might face. Plus – how do we reach students, researchers and academic experts so they actively engage in the Multistakeholder consultations and activities that are offered both on a national and international basis? This mailing list is acting pending a better way to engage – and during the 2022 AGM it was suggested that rather than using a mailing list to engage students, an instant messaging chat like **Discord** should be used. To-date, nobody has volunteered to take on this task.

New AMS

The new "Association Management System" was rolled out late last year. The new system proposed by vendor Fonteva, was supposed to provide much more flexibility for everyone to log into their account and engage in cross-chapter discussions as well as managing their mailing list and Special Interest Group submissions. It somehow fell short of the target by being cumbersome to use. However, it has added some functionalities which were not previously available.

We invite you all to log into your account from https://portal.isoc.org/ and check the facilities for yourself.

Focussing on 2025

Like previous years, 2024 has been a challenging year for everyone.

In 2025, with your help, the Chapter is planning the following activities:

Continued Engagement with other UK based associations

- Engage with UK operators (through the newly created **NetUK** Group) and sounding out their policy concerns relevant for ISOC to engage on further such as over Online Safety Bill.
- Continued engagement with TechUK when the latter is ready to ramp up activity.
- Continued engagement with BCS when the latter is ready to ramp up activity

UK IGF

- Participate in preparation of 2025 UK IGF - in the same capacity as in previous years.

Engaging with DSIT (UK Government)

- ISOC UK England board members liaising in to return MAGIG UK as a chapter remit on:

- ICANN matters
- ITU/UN engagement in a new group renamed "MIGG-UK (Multistakeholder Internet Governance Group"

Both of which are part of the Chapter Agenda.

UK Policy Consultations

- continue advocacy in the UK Parliament especially in regards to the new Labour Government, both directly but also in coordination with other UK-based civil and professional society organisations.

Direct Engagement on Global Internet Governance

- Organise event (in person or online) on the swathe of UN initiatives of relevance to Internet governance and the MSM from the GDC to the WSIS+20 (including the "multilateral effectiveness" initiative).

Questions could include: explore the relative importance and potential threat to the MSM model of these initiatives; where/how can stakeholders most effectively engage and on what issues, processes; potential outcomes - negative/positive to the MSM model of governance; how should the IGF evolve sufficiently to not necessitate a GDC Forum, etc.

This is an internal process that we will launch with our members – and it was not undertaken in 2024.

- Liaise with ISOC chapters particularly in Europe over EU and other policy spheres impact on the Internet
- Continue the Chapter involvement in the Global Encryption Coalition including signing up to Open Letters and Campaigns and relaying these campaigns to our UK audience

Emerging Issues

- Open a new activity that investigates and informs on impacts for Internet of AI looking at the number of academics, pundits and commentators that have suddenly added AI to their "expertise" in the last few months
- potential for a regular newsletter/channel that might also be an opportunity to gain subscribers and an independent revenue flow

The more volunteers get involved, the more we can expand on Chapter activities. We would like to hear from you if you would be interested in becoming a Convenor on any topic that fall within the mission values of the Internet Society.

As a reminder, the key topics for the Internet Society are based around the concept of Advocating to Defend the Internet:

- Countering Internet Threats
- Defending the Internet in the United Nations
- Extending Encryption
- Guiding Constructive Internet Policy
- Helping Shapre Internet Legal Precedent
- Sharing Cutting Edge knowledge

• Securing Global Routing

Conclusion

The UK England Chapter of the Internet Society has had a highly active and impactful year in 2024. Our efforts have focussed on promoting online safety, advocating for digital rights, and influencing key legislative processes. Through our submissions to various consultations, collaborative efforts, and public awareness campaigns, we have made significant strides in advancing our mission to promote an open, secure, and trustworthy internet for all. Our work on IPv6 has been ongoing.

We look forward to continuing our work in the coming year and making further progress in our mission to promote an open, secure, and trustworthy internet for all. We also invite all of the people on our mailing lists to participate further in the life of the Chapter, volunteering to become a convenor for specific projects. For more detailed information on our activities, please refer to the URLs provided at the beginning of this report.

Finally, I would like to thank the ISOC UK Leadership Team, Christian de Larrinaga, Desiree Miloshevic, Louise Marie Hurel, Matthew Shears, Steve Karmeinsky and Ruofei Wang.

There remains one empty seat which the Leadership Team will discuss in future meetings.

Stay involved and let us know what YOU want to focus on this year, as it is YOUR local chapter of the Internet Society.

Warmest regards,
Olivier MJ Crépin-Leblond, PhD
For the ISOC UK England Leadership Team, November 2024