



“Technology companies can be regulated like every other thing on earth”: Will Perrin on galvanizing political will and working with tech companies to institute regulations that protect children.

Ambika Samarthya-Howard

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Ambika Samarthya-Howard: Can you start by introducing yourself and sharing a bit about your work? People have described you as someone working at the intersection of the tech, state, and voluntary sectors. Could you break that down in terms of the work that you're doing?

Will Perrin: My name is Will Perrin, and I'm a trustee of Indigo Trust and Carnegie UK Trust. I work with three distinct groups—the tech world, the state, and the voluntary sector—and I'll start by saying they all speak different languages.

If you spend time with a whole bunch of tech people, they have a particular worldview, they have a particular form of language that they use, [they] generally have mediums of communication distinct from those used by government and civil society. For instance, they're intolerant of meetings. They tend to have an incredibly short time horizon of a few days or weeks, and almost no understanding of the wider cultural or societal context of anything that they do. That's even discouraged in most tech companies. Whereas the government, it's all about the meetings and having a very long-term view. While it depends on the type of government you have, it's generally about looking at the societal impacts of things that happen at a very large scale, well beyond the company.

The voluntary sector fits in between those things. It's not commercially orientated. It tends to be idealistic rather than pragmatic. Politicians will be more pragmatic. Civil society is quite often buffeted by fashionable waves of thinking and approaches, but never has any money. The tech field is vastly well-resourced. It's got money pouring out of every orifice. Funders compete to give tech companies money. The voluntary sector has to beg for money. And the government spends people's tax dollars. So they're very different cultures and I accidentally have taken part in all of those at different times in my three careers.

My first career was in the public sector. I grew up on a farm with dirt under my fingernails, in a very poor environment. Education got me off the farm and after I left university, I went to work for the government. I spent 15 years there at varying levels, from a desk officer all the way through to Downing Street—where I was one of the prime minister's advisers and private secretaries—to working with the intelligence community, to working with all sorts of different people. Then, I set up a non-profit social enterprise that was tech-orientated, and I ran that for about 10 years for Channel 4, the broadcaster. As part of that, I did consulting for many big tech and media companies in the UK and Europe.

Having worked across those sectors, I am well placed to join them together. Which is what I have done in our work dealing with online child sexual exploitation and abuse, which is facilitated by tech. The voluntary sector represents the victims and campaigns on behalf of the victims. The government has to be poked really hard to be stirred out of its slumber to act and do difficult things to change the law. Especially the law that impacts the tech companies that add to GDP—and are 'the future', as we keep being told. For the government, it's awkward and inconvenient to tackle a golden sector of the economy about some awful crimes. Through my practical experience, I've been able to help those three communities work together to tackle the problem.

Ambika Samarthya-Howard: Can you talk about what you've done to make governments care and to make governments more accountable? I'd like to hear about the strategy you were pushing them to adopt and as well as your strategy in getting them to adopt it.

Will Perrin: Back in 2017, I attended a meeting of a group of children's charities. And in this meeting, these storied children's charities that have been around for 300 or 400 years—if you add up the length of all their existences—told terrible stories of things that have happened to kids online. It was shocking. There was a relatively young representative from Facebook in the room, and she basically gaslit this entire audience of children's charities and said to them (I paraphrase) "I'm terribly sorry, but this is just one of those things. It just happens. Technology brings tremendous joy to hundreds of millions of people. This is the future and there's nothing we can do about it. You're just going to have to live with this. It sounds terrible, but there's little we can do. The government can't do anything about it either."

I was absolutely infuriated by this because, in my public sector career, I'd regulated vast swathes of industry. There's a huge difference between America and Europe in this respect. Four hundred years ago, a bunch of white folks got on a boat and left Europe because they hated the regulation that Europe was trying to bring to bear on their religion. They formed the basis of modern, white America. Europe carried on regulating during that time, and we still regulate everything heavily now. Modern America was founded on the idea of not having any regulation, and not having the state involved in what you do. Europe has always been about regulation to check the worst excesses of companies and achieve social goals in a democracy, and I include the UK in Europe.

I'd done loads of regulation, and I was pretty horrified by what I was hearing. I sat down with a colleague of mine who was a law professor, the brilliant Lorna Woods and said, "This is ridiculous. There must be a way of regulating these people. There's this Section 230 thing, which makes it difficult, but there must be a way around that." We sorted that out, and in about a week, Professor Woods had found a method of regulating social media companies to reduce harm.

Ambika Samarthya-Howard: Can you talk a bit about that method?

Will Perrin: If you go to a theme park, everything that happens to you in that theme park, within reason, is the responsibility of the person who operates the park. That was the model we brought to bear on social media. We said that the environment social media companies create is, in itself, harm-creating. The decisions they make about whether to moderate it, about how much staff they need to moderate it, how accelerated the discussion is, what is permitted or not permitted, and whatever other environmental conditions they set, are the companies' responsibility. These factors are not individual bits of content or messages; the company creates the environment within which messaging happens, and environment is a major determinant of the harm that arises from that platform.

I don't know exactly what the rules are in America, but in Europe, the person who operates the hazardous environment is responsible for keeping the public safe within it, and we can apply those principles to technology companies. In the UK, we call this a statutory duty of care. In American law, you might be familiar with tortious duty of care, where you go to the court to litigate and say, "You have not fulfilled your duty of care." In the UK, in the late 1950s Parliament agreed that in some sectors there's a default assumption that there is a duty of care that bears on some people, and it is set down in law, in statute. You don't have to go to court to litigate to establish it.

Professor Lorna Woods came up with this approach of a statutory duty of care imposed on social media companies and the systems that they run to make sure that those systems are safe, particularly for children. This is a breakthrough because we also found that this cut through the European equivalent of Section 230 and such duties of care were clearly provided

for in European law. In a week or two's work, Lorna Woods essentially cut the Gordian knot of this problem of how to regulate social media technology for safety.

I decided to take this to government, civil society, and tech companies and say, "You've got a problem emerging here, particularly for children online, and my brilliant colleague has come up with a way of addressing it that we think could work." We started to socialize that. We gave evidence to parliamentary committees in the UK, which are like the hearings you have in Congress in the US. The idea started to take off, and we persuaded the government that this was an approach that would work, and in 2019 the government baked our methodology into a policy 'White Paper'.

Our strategy from the outset was establishing that technology companies can be regulated like every other thing on earth is regulated, pressing hard to make the government change the rules to regulate these companies, and developing a method to do it. We built a campaign from that very simple premise, but found lots of other people wanted to come on board with it. We took the work to Carnegie UK (which is much smaller than the Carnegie Corporation or the Carnegie Endowment; it's only about 2% of the size). CarnegieUK hosted the work as part of their focus on national wellbeing and began to drive a campaign working with other charities, like the National Society for Prevention of Cruelty to Children and Barnardo's, so there was an excellent grouping around child safety online that had been there before we arrived Child Health Information Services [CHIS] who also came on board. Between us, a major campaign started to take shape.

Being endowment-funded at CarnegieUK was a great privilege, we didn't have to compete for money and attention every day, as most charities do. One thing this enabled us to do was compensate The University of Essex and fund Professor Woods' time. Then, graciously she was able to give charities world-class legal thinking for free, as a campaigning resource. We were able to distribute knowledge around the field to those who wouldn't otherwise have been able to afford to access it.

The duty of care concept was universal not just about protecting children this attracted a wide range of supporters, broadening the campaign.

Critically, the campaign wasn't just about children. Child safety was very much the leading emotional issue and a strong campaigning issue that drove enormous amounts of media and parliamentary interest. But other groups joined the campaign representing people who were also suffering as a result of poor design and operation of social media. For instance, we became aware that there was a huge amount of fraudulent advertising online - so much so that it was distorting national crime figures. So my colleague Maeve Walsh—a brilliant organizer and campaigner—helped catalyze a campaign of the entire British financial services industry. They started to lobby the government to regulate adverts, particularly Google Ads. When any

government wakes up to find the financial services industry camped on its doorstep, they pay attention.

Ambika Samarthya-Howard: What was the angle of the financial services if it wasn't specifically around children?

Will Perrin: Fraud. They were extremely angry with the extent of fraudulent adverts that they suggested Google was distributing, which qualified in their view as fraudulent financial advice. These were things that you couldn't get away with in regular print advertising and that caused them financial loss and made customers of the financial services industry extremely distressed. The financial services industry said it was Google's fault in particular, but I think the other companies were guilty as well for not vetting adverts as a newspaper would.

Other groups joined the campaign for a duty of care. We had very strong support from the anti-antisemitism movement in the UK, which essentially is the Jewish faith lobby against antisemitism online, and also from Muslim communities against Islamophobia. We also had tremendous support from Black athletes who suffered vast amounts of racist abuse particularly on Twitter. If a Black footballer misses a goal in a penalty shootout, Twitter would light up with racist abuse directed at the young man or woman, who might be 17 or 18 years old. We had some very eloquent women's sports people as well who suffered vast amounts of online abuse. Such campaigners were very powerful—not just their celebrity status, but their dignity and eloquence.

It was a multi-part, distributed campaign in which child safety was a major component and a major beneficiary of the eventual legislation. In a campaigning sense, it's not sufficient to have a solely child-safety-based argument, no matter how serious that is. The other sectors are necessary to create the broadly-based case that demands attention and carries politicians. Generally, everyone can benefit from the same rule changes.

Ambika Samarthya-Howard: Can you walk me through what comes next? You have this campaign, it lands on the government's doorstep, and then what? Does the government pass a bill, or call the CEO? What happens next?

Will Perrin: The government was starting a phase in 2016/2017 of calling tech executives before Parliament. The tech executives treated parliamentarians almost with ridicule, and the British Parliament was furious. The politicians stand on their own dignity, and they simply couldn't believe that they were summoning tech executives who treated them with such contempt.

We went to the government and presented Professor Woods' idea from CarnegieUK. As I spoke to government officials, I realized that they weren't used to regulating things, especially not the people who were sitting at the tech desk. They had not been asked to do it before. I did a lot of

work quietly working with them, talking about when I used to regulate technology companies or media companies as a civil servant and helping build their confidence that the types of rules we had would be effective. I'd regulated much more hard-nosed industries than tech in the past: the oil industry, the gas industry, gambling, pubs, bars, and clubs. I met with people from those industries who would make the tech industry people look like a soft touch. I used anecdotes and stories from the times we were regulating Rupert Murdoch or dealing with casino people or hard nosed people from the oil industry.

I did a lot of work giving confidence to civil servants that tech regulation could work. I had to work hard to counterbalance the impression that the tech sector had generated by 2017 that they were unregulatable and had simply descended from the heavens, so we should just be grateful for them. It was very much a case of creating confidence in regulation and an understanding that global companies tended to expect regulation, they wouldn't run away. Eventually, the government produced what in British parlance we call a white paper.

Ambika Samarthya-Howard: It seems like you've taken all the right steps to get the government to understand what's happening, but then you had to get the tech companies to do the right thing. How did you make that bridge?

Will Perrin: I can speak from my experience regulating companies from different industries and say that regulation for any multinational company is perfectly normal. It happens all the time. Every single industry in the world has forms of regulation. And if you're an experienced business executive, you know this and you know how the deal works around the world. You know that in, say, Louisiana, you're not going to be regulated so much, but in California you will, and in Europe, you will some more. Against this background there's always a deal to be done.

The other important thing was that I could see the amount of money that the tech companies are making. You go into their offices and you count how many sushi chefs they have. There is money everywhere, and they can afford to spend some on regulation. They know that regulation will come and some of that money will have to be spent to meet those regulations. It's just a universal deal that the tech industry was coming late to.

The difference is that in Western Europe, you can have that conversation, but you can't have that conversation in the USA because the cultural norms are totally different. I can't remember the exact figures I saw, but I believe tech companies spend something like \$70 million on K Street, in Brussels over €100m. In London, they spend maybe \$10 million. There's a lot less expenditure on anti-regulatory work here. And remember, the tech companies outraged UK parliamentarians and made them very angry about the way in which they'd treated the British Parliament. This sentiment was similar in all capitals in Europe.

We took the time to talk to the tech companies quite a lot, and we took care never to demonize them—I use their services all the time. We're using Zoom now. It's a great company. Some of the

tech products are fantastic, and I wouldn't want them to go away, but I'm happy to have that mature dialogue. The companies were always happy to talk. They might have disliked us very much because we were causing them a lot of hassle, but we would always have a dialogue. We would have meetings with the government and the tech people in the room, and maybe it wouldn't go very well. Then we would ring up the tech companies afterward to ask them how they think it went and try to sweep up the mess.

There was a reasonable working relationship because we weren't demonizing them. Other actors in the campaign would have to demonize them because that's how it was, but from CarnegieUK we were treating them respectfully. We were treating them as a business, but forcefully. We'd essentially say, "You are a business, but you are about to be regulated. We want you to have a say in how you're regulated, so that it works for you and your shareholders, but it's got to work for child safety and it's got to work for other minority groups online who suffer."

Ambika Samarthya-Howard: How did this situation of the tech companies antagonizing the British Parliament evolve?

Will Perrin: There is a certain code of behavior in how you appear before the British Parliament. The British Parliament stands on its dignity as the mother of parliaments, they take it very seriously. There is a code of behavior, straight dealing and humility that you display in front of them. The people the tech companies put up to appear before committees didn't follow those rules at all closely enough. Any neutral informed observer would look at those hearings and think 'that's a bit weird you really shouldn't be saying or doing that'. The tech companies seemed to have incredibly bad advice or to not listen to advice.

Ambika Samarthya-Howard: How did they ever recover from that?

Will Perrin: They didn't really. But there is a symbiosis between any industry and a government. If you employ loads of people in a country, and if you provide services that almost every adult citizen uses, you gain status from that. You get invited to meetings, you get asked in, and you get asked your point of view, particularly if the government isn't fully equipped to understand the nature of your business. No government in the world is rammed full of technologists who understand, in a really deep way, how Facebook's algorithm works. So the government needs to learn from the tech companies how their stuff works to set the rules. But the government also knows that if it passes rules that break Facebook or break WhatsApp or Google in the UK, the public won't thank them. There is a fine line to tread in getting all that right.

So whilst the Parliament might've felt the tech companies were ridiculous, the companies' role and status in society meant, they weren't just left in the corner. In fact, it was quite the opposite. They were very much in the room advocating. It's fair to say that if the tech companies hadn't put themselves in such a weak position by essentially insulting Parliament's dignity, they might

have gotten away with it. They might not have had any regulation. That was negligence on the part of the tech companies.

There's also one point I touched on but didn't complete, which is the role of the media. We first did this work in 2017/2018. I was asked to write for *The Observer* on our work at Carnegie. And a piece about this duty of care that appeared in *The Observer* in the spring of 2018. A couple of days later, I picked up a phone call and it was someone from *The Daily Telegraph*, which is the right-wing establishment newspaper in the UK. They really liked the duty of care piece and wanted to use it in a big campaign on social media safety. *The Daily Telegraph* then began a remarkable, highly impactful ['duty of care campaign'](#) against the tech companies to defend children. Other newspapers followed the Daily Telegraph's lead.

The campaign had an extraordinary media campaign behind it, and didn't pay any money for it. There was no PR working from the campaign. But it ballooned because the campaign was able to put up so many people who were representative of victims, and sometimes even victims themselves. It made extraordinary, and at times very distressing, journalism.

I had a role at the center, but I don't want to give the impression that I was running the campaign. It was a highly federated campaign. In each topic area—child safety was the major one, fraud and financial services was another, racist abuse and religious abuse was another—in each of those areas, there were highly skilled, highly talented people running campaigns that all mesh together. We at Carnegie would provide a networking service, for want of a better word, through my colleague Maeve Walsh. She would mesh it all together so that everybody knew what everybody was doing. There was constant coordination between these different campaigning groups. Very occasionally, we might have competing campaigning objectives, but because everyone involved was a fairly seasoned campaigner, that was fine. Someone might say, "I'm not going to agree with you here. I'm going to oppose you on this thing. But you understand, that's just business", and it would all work okay.

It was a very unusual federated campaign, and my team was part of a meshing process at the middle, but at the same time we were also feeding in this brilliant academic work from Professor Woods, which the parliamentarians greatly valued because when they saw her work, they knew it was exacting, completely above board, free of any commercial or campaigning influences. Her work was extremely highly skilled.

Ambika Samarthya-Howard: I think the minute you have a right-wing newspaper supporting you, it's a game-changer because then you're crossing lines and saying this is a shared value, not a political value.

Will Perrin: Absolutely. We also had this bizarre thing happening within the right-wing media where they would disagree with themselves about the campaign. You would have a front page for the campaign about child protection, and then you would have an op-ed piece from a star

columnist saying how this was restricting freedom of speech and was ridiculous. It was extraordinary times with the chaos of the Boris Johnson and then the Liz Truss administrations and some parts of the right-wing press, being vehemently against all of it.

Ambika Samarthya-Howard: Do you feel like that's something that can be replicated outside of this government or outside of this country? You have a very clear narrative of this campaign and its success, as you should, but I'm sure you were blocked many times through the process. When you faced those blockage points, what were some insights or learnings that might be of value to others?

Will Perrin: I'll answer that in two bits: replication and blockage points. First, yes, some of the structures can be replicated—for instance a federated campaign on a universal issue, with a series of verticals, one of which is obviously child safety. These verticals give you the opportunity to advance on a number of fronts—one front will always be making progress while others are quiet. The Oak Foundation's interest is in the worst possible abuses of children, things that are absolutely grotesque. But there's a broader children's lobby for say children's developmental needs. Also is social media changing kids' approach to their attention deficit—the Jonathan Haidt work, or how childrens' exposure to pornography is bad for sexual development? There's a complex set of issues that can be raised in a federated campaign—this multiplies the number of voices speaking to the government.

An important learning is that you need to campaign across a number of fronts, but not all of them will succeed. This comes to blockage points. At some point, some things just have to be let go because they aren't going to get through. The campaigning group that is involved often won't let them go. But it's obvious that the government that is sitting there soaking up all the pressure will decide internally which bits to take forward. In the UK, we ended up with quite a few vertical pieces being shorn off by the government, particularly the protection of adults from racial abuse and religious abuse. That was largely cut out. The protection of politicians was cut out as well. In such a campaign you have to have a federator, I think, to bring people together.

Ambika Samarthya-Howard: What is a federator?

Will Perrin: Someone who plays the role that we played at CarnegieUK. We didn't plan it this way—most of my analysis here is retrospective. The role grew organically. But in hindsight, the role we played at CarnegieUK was broadly neutral. We were not there to campaign for any of the vertical issues. We weren't child safety campaigners, we weren't abuse or racism campaigners. We were motivated by CarnegieUK's founding commitment to improve national wellbeing and were there as experts in government and parliamentary processes armed with the brilliant legal approach Professor Woods had derived to tackle the problem. Endowment funding enabled us to remain relatively neutral of campaigns—we were of course accountable in detail to the Trustees.

Part of the federation role was a mindset. Maeve Walsh and I have had careers mostly in public service. I would always say that we come from a culture where you would have to get 100 people to agree with you just to buy biscuits for a meeting and it might take a couple of years. So we were used to painstaking work to achieve agreement; that was just natural. We were quite happy to take ages talking to people about stuff and to maintain this very long-term perspective. This enabled us to keep a campaign going over six or so years, a very grueling activity.

I think that mindset was important. We would see other people crash and burn when they couldn't get the attention they felt they needed. Those personality types are necessary for different functions, but that quiet, calm, coalition-building role was important. It was also a temperament thing; we had the right team. Professor Woods is an academic, so she was used to interminable bureaucratic processes and long term research, which suited the legislative grind. We had some excellent support staff from CarnegieUK. It's important to have a campaign that is broadly based and has someone whose job it is to federate it or factor it together, whatever you want to call it, who is non-competitive. It's also important to get the media behind you.

When you approach a campaign, you have to look at the constitution or charter of rights in that country very carefully because you will always have a classic libertarian free speech battle in there somewhere where someone will say, "Yes, it's fine that you should protect the children, but that impedes my right to speech which is more important." In my view that's a failure to balance rights, quite repugnant. The right to life in most systems dominates the right to free speech, but people don't like to present it that way. You have to understand that quite carefully in any territory you wish to advance this in.

The other important element in replication is that one must draw on successful campaigns in other countries. We at CarnegieUK, have done work in Australia and Canada and in the EU, and there's an international network of people who you can call up to help now including brilliant, for instance, child specialists like Beeban Kidron. Beeban has worked in California with Senator Buffy Wicks, with the United Nations as well. If you plug into those networks to draw strength from them and their experience, it will help you replicate a campaign.

Ambika Samarthya-Howard: Were there any limitations to your work or, very broadly, things you haven't been able to overcome?

Will Perrin: It's funny—some things we got in that we never thought we'd get in, and other things that we thought were a certainty didn't happen. One of the strange things we managed to get into the UK legislation was cruelty to animals online. There's a huge thing in social media of people torturing animals by request. It's pretty grim. The government conceded on that even though there was barely a campaign for it. But we weren't able to get there on protecting adults from a wide range of things on social media that are very clearly harmful, that they're protected from on broadcast TV and radio. One example is suicide ideation and coverage of suicide.

That's very, very carefully regulated on broadcast media, TV and radio, but to our horror, we couldn't get anywhere with that in the UK. We also didn't quite meet our goals on protecting women from gendered and other abuse online.

Ambika Samarthya-Howard: Why is that?

Will Perrin: It came down to a debate between a bunch of libertarians inside the government party that we couldn't quite crack. At the end of the day, a small group in the government will make a decision on their concessions weighing up interests that are sometimes only visible to them and they weren't prepared to go that far. On suicide, it's just perverse.

One absolutely vital thing we failed on is the protection of the political process. I am still campaigning on this now. The European social settlement is very different from the North American social settlement. In most Western European countries, we have quite stringent protections of traditional media during election periods, but on social media, we don't. We are now starting to see people being deterred from entering into politics because of the abuse they receive on social media.

Social media is undermining the nature of democracy itself, and that's really grim. This can be regulated, it's not a problem. It would be very easy. We have a model to do it. You basically say to the social media companies, "You have to treat elections as a foreseeable risk event. There is a risk of harm to democracy. We need you to go out and interview candidates for election, discuss the bad experiences they've had, what their harms were, and come up with a risk assessment. Then, with a regulator looking over your shoulder, come up with a risk management plan to reduce those risks." For instance, it could be giving self-protection tools to politicians so they can turn off certain types of abuse. It could be having a rapid response help line that actually works promptly for politicians who are being highly abused online. I'm starting to campaign on that now, but we didn't get anywhere with it in the past.

I also think there's more to be done on Safety by Design, which is Beeban Kidron's brilliant work at 5Rights. That's still not quite baked enough into the law in the UK, so we're all campaigning to get that improved.

Ambika Samarthya-Howard: Can you talk a little bit about that brilliant work at 5Rights?

Will Perrin: Baroness Kidron is a brilliant former film producer, and an extreme force of nature. Back in 2017, she'd done an analysis similar to Professor Woods, but independently of us, on how the design of the platform creates harm. You can have a really safe platform like Lego for instance. If you go on the online Lego platform, nothing is unmoderated; it's excruciatingly safe. That means it doesn't have all the features of some other platforms, but it's incredibly safe. Your kid can go on the Lego website, use the Lego app, totally safe—it's designed that way. That has trade-offs that Lego has been prepared to make because of their brand. Whereas in 2017, if you

were looking at 4/8chan, [an online bulletin board that anyone can post anything on], or something like that, it was the complete opposite. It's designed differently.

Beeban Kidron baked this Safety by Design concept into a data protection law in the UK. In the legislation of the Online Safety Act, Safety by Design is in there, but it's not strongly emphasized. The regulator OFCOM who is now implementing the Act has taken that to mean that they don't have to focus so much on Safety by Design because it's not emphasized enough in the law. Even though it's clearly there in the debates in Parliament, it's not strongly encoded enough in the law. But it is the most powerful weapon because making small design changes has massive ripple effects for every child user.

Some of those things are difficult. For instance, there's breadcrumbing for child victims, where an abuser will meet them on a safe platform, then take them to a slightly less safe platform, then to an even less safe one, and then abuse happens in a live video chat. These things are not straightforward to design out of existence, but perhaps they can be.

The other issue is small platforms. As you know, in regulation in general, there's this concept of proportionality, which is that a large platform creates the most risk and has the capacity to bear the load of regulation. Now, if you take proportionality properly, it should be risk-based proportionality. But unfortunately, there's a surprisingly long tail of very small, high risk platforms that have harmful interactions in them but strong protection measures for this long tail were essentially cut off with a risk and size limit. We feel very strongly that it should just be a risk. For instance, there's a suicide site in Texas that helps people kill themselves. It's very small, and we were very clear that we should find a way of stopping that. I've got no interest in having a site that kills people in my country, nor does any regulator here, nor does any parliamentarian. It's appalling, there's no credible free speech justification in the UK. We're pretty annoyed that because of the way the UK law has been implemented, these small platforms appear to have been left off.

Ambika Samarthya-Howard: That's interesting because you would think it's so much easier to regulate a small platform.

Will Perrin: It should be easy to regulate them, but it isn't because of a flaw in the drafting and a flaw in the approach. The campaign worked with a legislator from the governing party to defeat the government. They led a short campaign on that, which they won. They won a vote in the House, but for technical reasons that are too long to explain, the regulator isn't very keen on taking that approach. So that's annoying and should be solved. I think it will be solved because it's so egregious.

Ambika Samarthya-Howard: Looping back to what you said in the beginning, you mentioned that when you deal with issues like this, you widen the lens so it's not just about children, but a

broader issue. Did you see any point in the process, or in your career, where you felt it was helpful to be more specific about children?

Will Perrin: I think some of the people in the children's lobby were annoyed that the campaign expanded to cover other issues. It is far more powerful to have a broadly based lobby when you are tackling the world's biggest companies in the first territory to try a new regulatory approach. It was an extremely difficult political environment to be working in, particularly in the UK, in the chaos of post-Brexit, the Johnson administration, the Truss administration, the early Sunak administration. It was absolute turmoil trying to get anything done in those times—you needed very broad foundations to support a campaign and as many voices as possible. In my judgment, having been through the process, I think it's probably wrong to say that an exclusively child-focused campaign would've done better.

Ambika Samarthya-Howard: For people looking to do similar work in other places, what would be a good learning for people in say, East Asia, or in South America?

Will Perrin: I am sitting in a former colonial power in Britain and don't want to sound neo-colonial. It would be invidious to say, "This will work for you," because the cultural contexts are completely different. We know in Japan, for instance, one of the things that drove some online safety legislation was the suicide of a female wrestler who'd been on a popular TV show illustrating all too well differing cultural contexts.

One of our colonial legacies from Britain was a legal code still recognizable in many countries. I would tentatively say that, "We have demonstrated an approach that works in English law, perhaps that is useful in your country." As we know, tragically, abuse of children is universal. It's an absolute horror. There is a whole range of widely diverging cultural issues that perpetuate that. The online component is only a bit of it, but unfortunately, it is a strong accelerator. I remember talking to Interpol about their experience in East Africa. The moment internet bandwidth increased, horrific things started to be uploaded. There is a colonial-era tension here, which I always want to be conscious of and humble about, but if we can help, then we'd be delighted to do so.

Ambika Samarthya-Howard: I appreciate your thoughtfulness in that answer. This was fantastic. Thank you so much, Will.

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** This interview has been edited and condensed.*