The Muslim Council of Britain

Response to inquiry by the House of Lord Communications Digital Committee Inquiry

The Online Safety Act: implementation and impact

Submitted by the Muslim Council of Britain - Sep 2026

About the Muslim Council of Britain

The Muslim Council of Britain (MCB), founded in 1997, is the UK's largest and most diverse Muslim umbrella body, bringing together over 500 mosques, schools, charitable and professional organisations, representing a large cross-section of Muslims in the UK today.

We are pledged to work for the common good of society as a whole, encouraging individual Muslims and Muslim-led organisations to play a full and participatory role in public life. Our longstanding vision is to empower Muslim communities to achieve a just, cohesive and successful British society.

Our relevance to this inquiry on the Online Safety Act is the very youthful nature of Britain's circa 4m Muslims. Compared to the overall population, British Muslims are significantly younger as almost 50% of British Muslims are aged 24 years old or younger, compared to 33% in the overall population [1]. Their lives, like most young people across the country, are dominated by mobile phone use, social media apps, AI chat bots and more, and the associated risks and harms this exposes them to.

Inquiry Response Section 1:
Impact of the Online Safety Act

There is mixed evidence to date suggesting the OSA has made a material impact on the safety of children online. Despite one of the Act's much lauded features, introducing mandatory age verification, an Internet Matters' annual survey of 1,000 children and their parents in the UK (Digital Wellbeing Index research) found that 46% of children think that age checks are easy to bypass. [2] And a third (32%) have bypassed age checks by entering fake birthdays, using Virtual Private Networks (VPNs), submitting a video of another person's face or even AI-generated characters, and for boys manually drawing on facial hair. It is clear that the facial recognition software being used by big tech companies isn't keeping up with relatively simple technologies enabling circumvention of age verification checks.

On regulating harmful content, the OSA's impact appears to be a drop in the ocean compared to the scale of harmful, hate-filled, misogynistic and other toxic content children are being exposed to. Researchers at the National Education Union (NEU) undertook 'The Algorithm Experiment' [3] where they created four fictional profiles of British 13-year-olds, two boys and two girls, across TikTok, Snapchat, YouTube and Instagram, with typical teenager interests like gaming, beauty, music and sport. Within minutes of registering their accounts, their feeds were serving them content featuring guns, self-harm, sexualised material and misogynistic narratives.

The NEU continued also stated that "Over the course of a week, the profiles were served hundreds of pieces of concerning content, including material glamourising guns and knives, explicit references to sex and pornography, promoting extreme fitness regimes and diets, and encouraging misogyny, isolation, self-harm and even suicide."

Pornographic content is of particular concern in the context of online social media platforms being used to exploit, control or abuse victims. So-called revenge porn and online harassment are forming increasing workloads of helpline service operators [4] and in more recent years sexualised / porn-like AI deepfakes of school pupils using photos their schools posted on their website are being used by professional criminal gangs in blackmailing operations with huge ransom sums being demanded [5] [6]

Context must be kept in mind - the scale of the harmful content many children are seeing online today in 2026, makes discussions that were common only a decade ago look trivial e.g. confining “lad mag” magazines to top shelves in supermarkets and newsagent shops to prevent children being exposed to “soft” porn. [7]

Inquiry Response Section 2:
Ofcom’s implementation and enforcement

We understand that Ofcom’s statutory reporting is due in Q4 2026. In the meantime, Ofcom’s most recent report in December 2025 appears light on detail. Ofcom states what is obvious to anyone following discourse on far-right mobilisation, “There is evidence that terrorist content and illegal hate speech is persisting on some of the largest social media sites, [...]. We have launched a new programme to address these concerns.” [8]. Yet Ofcom’s report does not provide any details on what this ‘new programme’ is, when it came into effect and what it is designed to achieve.

Certainly with respect to tackling Islamophobia and anti-Muslim hostility being amplified by foreign-based billionaires with little to no push back, enforcement, if any, that Ofcom is carrying out appears to be the equivalent of turning up to a gunfight with a toothpick. [9]

Much of the challenge with enforcement appears structural and deep-seated. There is an assumption that the big tech companies will themselves “see the light” and develop “risk assessments” with due regard to the vast impact their products and platforms have on society, and in particular children. With regarding to emerging technologies in the last 12-24 months like GenAI and AI chat bots, rather than outlining a proactive framework, Ofcom’s last report meekly confirms their reactive approach: “We expect regulated providers to update their risk assessments as relevant new functionalities are rolled out, and to put safety measures in place where needed.” [8]

The reality is that big tech companies' priority is naturally profit, and risk management is only taken seriously when there is a ‘risk’ to their bottom-line. However, Ofcom reports that as of September 2026, it has only issued circa £7m of fines (most of which remain unpaid) on 11 services providers [10], which in the context of the sums involved for many big tech companies, will hardly reach the list of top 10 items on their corporate risk register. This is despite the OSA empowering Ofcom to issue fines to tech companies of up to £18 million, or 10% of their global revenue (whichever is greater), if they fail to comply with their duties. [11]

To use an analogy from another sector, construction, the Health and Safety at Work Act 1974 established the Health and Safety Executive (HSE), consolidating the very patchy legislation around safety in construction that had existed to date and empowering a national regulator to enforce. Fatalities in the construction sector have reduced almost six-fold from 2.1 per 100,000 workers in 1981, to 0.37 in 2025/26. [12]. No doubt this is in part thanks to HSE enforcement action, which last year included issuing over 4,400 notices and £33m worth of fines. [13]

The safety of Britons from the harms posed online needs to be viewed with the same equivalence as, for instance, harms caused from major work-place sectors like construction, except the stakes are higher and the evolution of the technology much faster. Indeed, GenAI and AI chat bots are already

showing that major technological advancements are happening at the scale of months, not years, and legislative instruments need flexibility to address emerging additional harms without the often 12+ month lead time of primary legislation.

Finally with respect to fines, Parliament would do well to follow closely the People of the State of California vs Meta Platforms Inc child safety litigation case. which resulted in Meta agreeing to an $18 bn (£13.3bn) settlement with 48 US states, to be distributed in annual installments over a 10-year period. [14]

Inquiry Response Section 3: Adequacy and future of the legislative framework

(A) Tackling addictive design and algorithmic feeds

Within the Internet Matters' most recent annual survey [2], parents said their most immediate, day-to-day concern was the amount of time children spend online, and additionally that their children encounter AI-generated videos and images, some of which are difficult to identify as AI. The children surveyed also reported struggling to control their screen time:

- 46% of children reported they keep playing the same games or watching the same TV shows or films even when not enjoying them.
- 45% admit to stopping playing sport or doing exercise because they want to play video games, watch TV or be on social media.
- 59% of children say they stay up late on their devices.

These concerns are echoed in forthcoming research by the Muslim Council of Britain on "British Muslim Attitudes to Use of Social Media." As one parent survey responder said: "It's just all so toxic and relentless. Like a playground with a few nice toys, but hundreds of dangerous ones they have to weave through."

Currently, the Online Safety Act is significantly inadequate in that it doesn't appear to materially address the issue of addiction-centred design and excessive screen time, both for children and adults. As highlighted in the Muslim Council of Britain's submission to the DSIT (Department of Science, Innovation & Technology) earlier this year [15], engagement-maximising features drive excessive use that displaces sleep: 89% of teenagers keep a device in the bedroom at night and over 70% use a phone within 30 minutes of trying to sleep, with prolonged screen use (e.g. doomscrolling) linked to poorer quality sleep [16].

The power of algorithms in driving addictive and other harmful or dangerous behaviours, including suicide, cannot be underestimated. At the inquest into the death of 14-year-old Molly Russell, the coroner found that online content contributed to her death in "a more than minimal way." Of roughly 16,000 pieces of content she engaged with in her final six months, around 2,100 related to depression, self-harm and suicide — much of it pushed to her by recommendation algorithms she had not asked for. [17] Whilst there is no silver bullet, proposals such as algorithmic plurality [18] - giving users the ability to choose or contribute to designing the algorithms that dictate what they see on social media - must be given serious consideration. In the European Union (EU), some of the issues associated with addictive design, infinite scroll and auto-play are expected to be addressed through the upcoming Digital Fairness Act.

Key Recommendation 1: OSA must regulate platform design, not just content. We agree with the Children's Commissioner Dame Rachel de Souza who has argued that the Act's focus on moderating harmful content rather than addressing potentially harmful platform design features is a core weakness — features like infinite scroll, autoplay, and algorithmic recommendation engines designed to foster addiction are not being directly tackled. [19]

(B) Independent Third Party Verification on Safety

Most online social media platforms have failed to effectively implement their Terms of Service and remove harmful, hateful, and illegal content. [20] A study by ISD found that during the days and hours leading up to summer 2024 racist and Islamophobic riots post-Southport, false claims about the attacker (including his name and background) were still online, being actively shared and recommended to users, even after they were confirmed to be false. ISD highlighted that across 45,000 messages posted to 55 British far-right Telegram channels in the 10 days after the Southport attack, the use of anti-Muslim slurs more than doubled in this period. And this was even before GenAI was in widespread use. With GenAI now prevalent, the volume of hateful posts that likely violate Terms of Service (in particular those spreading misinformation) has multiplied by orders of magnitude, yet the adequacy of human moderators and/or automated AI mechanisms implemented by big tech in their platforms to comply with their Terms of Service does not appear to have evolved significantly to keep pace.

Compared to other industries, it beggars belief how light touch and industry-led verification is for online social media and similar platforms. To take one example, the automobile industry cannot offer a new car to the market without first achieving 'type approval' that is verified by an independent third party (in the UK, this is VCA - Vehicle Certification Agency). Independently witnessed testing of the product - including systems like braking, lighting and crash performance - is performed to ensure it meets the minimum safety requirements.

In similarity to cars, the ubiquitous nature of online social media and other platforms means the same principle should hold true: the default should be that the introduction of significant new features, products or services should be subject to the manufacturer (or in this case, the big tech companies) proving it is safe. At the moment, we have the reverse situation where new products are launched, and safety reviews follow reactively after. This status quo suggests the success of big tech companies in lobbying to dilute legislation like the OSA, ensuring the obligations on them are limited to "risk assessments" and the like, whilst users and society at large bear the brunt, until legislation catches up (if it ever does).

Key Recommendation 2: Independent Third Party Verification on Safety needs to be urgently introduced to ensure features and products offered by tech companies are safe first before mass use. The current framework where big tech companies launch a new product or platform alongside a "risk assessments" (which themselves lack transparency as they are not made public) which Ofcom then monitors is wholly inadequate.

(C) Fines

As of September 2026, Ofcom reports it had only issued circa £7m of fines (most of which remain unpaid) on 11 services providers [10]. In the context of the sums involved by big tech companies, this is a woefully low and insignificant amount.

This is despite the OSA empowering Ofcom to issue fines to tech companies of up to £18 million, or 10% of their global revenue (whichever is greater), if they fail to comply with their duties. [11]

Key Recommendation 3: Fines issued by Ofcom need to be proportionate to the harm being caused to Britons every single day. Single digit million figure fines to big tech companies pales in comparison to the multi-billion pound costs of addressing the additional harms introduced to society as a result of their products, from suicides and mental health epidemic, to pornographic addiction or to the widespread spreading misinformation leading to violent far-right mobilisation.

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