

**PUBLIC CONSULTATION PAPER ISSUED BY THE
MINISTRY OF COMMUNICATIONS AND INFORMATION**

ENHANCING ONLINE SAFETY FOR USERS IN SINGAPORE

The Ministry of Communications and Information (MCI) invites the public to provide feedback on proposed measures to protect Singapore-based users of social media services from harmful online content. Please refer to the public consultation paper published at <https://go.gov.sg/feedbackonlinesafety> for more details on the proposals.

MCI will publish a summary of the key feedback received, together with our response, following the end of the public consultation. Please be assured that the identities of respondents will be kept confidential.

Please fill in the template below and email the template to OnlineSafetyConsultation@mci.gov.sg by 10 August 2022.

| | |
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| (If you are providing feedback as an individual) Age group | NA |
| (If you are providing feedback as an individual) Are you a parent of a child aged below 18? | NA |

**PUBLIC CONSULTATION PAPER ISSUED BY THE
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Questions for public feedback

1. We propose for social media services to put in place system-wide processes to reduce users' exposure to harmful online content for specified categories of harmful content such as (i) sexual content; (ii) violent content; (iii) self-harm content; (iv) cyberbullying content; (v) content endangering public health and (vi) content facilitating vice and organised crime (para 10 and Annex A). Do these categories cover the range of harmful online content you are concerned about? What other areas of harmful online content would you propose to include?

As an organisation that is dedicated to provide social, emotional, and legal support to people engaged in the sex industry, we have witnessed a range of harms done to adult services providers and how the internet acts as a double edge sword. On the one hand, the internet provides safety to sex workers who wish to screen clients before meeting them in person, to conduct sex work without in person contact (prevents spread of diseases e.g. Covid19 and Monkeypox), and allows them to work autonomously without the control of gangs and vice syndicates. On the other hand, the internet often punishes sex workers by giving a platform to people who video them without their consent, or by blocking their access to their safety mechanisms. As sex workers are part and parcel of Singapore's society, we hope to share their perspectives on enhancing online safety.

Firstly, sexual content should not be seen as inherently harmful.

We are concerned that there is a lack of distinction between harmful and harmless sexual content. Harmful sexual content being those that are taken without consent, those that involve minors, and those that are circulated against the will of the persons featured in the content. It also includes those listed in Annex A, pointers 2 and 3 in the "All Users" column, i.e. "content that depicts or promotes deviant sexual behaviour" and "content relating to or encouraging sexual offences under the Penal Code, the Children and Young Persons Act, and the Women's Charter". Harmless sexual content is content that is educational or that are created with the full consent of all adult parties involved.

It is unclear from the consultation write-up as to what MCI believes to be the harm that "sexual content" (excluding content in pointers 2 and 3) causes.

The term "explicit" as used in Annex A as "explicit sexual activities" needs to be clarified. For example, 'explicit' (i.e., very detailed) descriptions of sex can be healthy if done so in the context of sex education. Doing a blanket ban on explicit content is inefficient as well as the premise of what explicit is, is unclear and is not specified.

Secondly, an indiscriminate and absolute censorship of explicit sexual content is likely to have negative consequences.

**PUBLIC CONSULTATION PAPER ISSUED BY THE
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While we do agree that there is a lot of sexual content glorifies violence against women, misogynist values, and sometimes perpetuates a distorted view of what a healthy sexual relationship should look like, a blanket censorship of “sexual content” on social media sites is unlikely to be very effective in preventing people from consuming such content, given that it proliferates pop culture and media today (arguably, Hollywood and Korean dramas are equally guilty of harmful content).

There is not enough evidence to show that the potential harms from the production and distribution of pornography outweigh the vast number of benefits. (Orlowski, 2012) Similarly, it has been noted in other research that with a shift from a total ban on sexually explicit material (SEM) to present time where there is wide spread availability of SEM in various media from publication to films, CDs and the Internet, the incidence of reported sex related crimes has not increased. (Diamond et al., 2010)

Focus on education and critical thinking skills

If there has to be any form of censorship, it needs to be accompanied by an equally if not more robust education system that equips people of all ages with the skills required to navigate such content in this digital age. This should include knowledge on topics such as

- Understanding consent
- What is considered as sexual assault
- How to identify unconsensual pornography or image-based sexual abuse, and what to do about it
- Understanding the pornography industry and how it works so as to be able to identify its motivations

We need education that favours and encourages critical thinking that will help people avoid the influences of mainstream androcentric pornography. The current sex education in Singapore that only preaches abstinence before marriage is sorely inadequate, and is arguably one of the reasons why people seek out information from elsewhere. This is what [Durex found when they ran a survey in Singapore with 400 men aged 18 to 29](#): that pornography is a top source of sex education for 39% of their respondents, as compared to 29.3% who learnt about sex through their school curriculum. (Ang, 2022)

Pornography can be beneficial

It has been noted in research that there are equally valid arguments that pornography can benefit women sexually, politically, and socially. Local adult content creators (e.g. [Vexa](#) and [Gracie](#)) who have been victims to image-based sexual abuse have spoken out about how doing OnlyFans allows them to reclaim their agency and find healing.

Adult content creators need protections too

**PUBLIC CONSULTATION PAPER ISSUED BY THE
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By casting all sexual content as harmful, it delegitimises the harm that many adult content creators (e.g. OnlyFans creators) face in their work which includes but not limited to, being blackmailed by their subscribers who threaten to release their real identities, being stalked by obsessive fans (e.g. *sasaeng*), having their content stolen and leaked for free or for monetary reward. These harms done to adult content creators if gone unchecked, would undermine efforts to ensure online safety for all.

Other harmful content we propose to include:

- Photos uploaded with the purpose of sexualizing of minors and adults against their will
- Sexual content that was taken without consent (e.g. upskirt videos, spy camera videos), and also “revenge porn”.
- Hate speech or an incitement to violence against a particular person or group of persons.
- Extreme beauty standards

2. Are you aware of existing safety measures and tools provided by social media services? If yes, which of these measures and tools have you found useful? If no, how do you think social media services can raise awareness of their safety measures and tools?

User Moderated (e.g. Reddit) versus Central Team of Moderators (Twitter)

On Twitter, we have utilised the reporting mechanism for being shown sensitive or disturbing content, however, reports take from 2 days to 2 weeks to be reviewed. On platforms that are moderated by users such as Reddit, it has been far more useful if we report it directly to the moderator of the channels with the reason why we would like it to be taken down. The content would often be taken down shortly after making it much more effective as they would often inform us once it's done. The gap in duration to take action shows that social media services with a central team of moderators often lack what it takes to resolve things in a timely manner that user moderated social media services offer.

The result that follows after for social media services with a central moderation team is that users are still exposed to such content even if it is harmful. Therefore the safety measures and tools provided by such platforms are not useful as content can be disturbing and affect other people as well if it is not taken down promptly.

Follow up reports

Furthermore, no follow up reports will be sent out even if any action has been taken for the content or user that has been reported. Therefore, we would not be able to know if reporting mechanisms are useful particularly if we do not receive updates on it. Social media platforms can automate such processes easily by sending out an email upon

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review of reported content or user on the actions that have been taken. Doing so encourages more users to utilise the mechanisms.

Increase accessibility through visibility

One way for social media services to raise awareness for their safety measures and tools is to allow for reporting mechanisms to be displayed more prominently instead of having it in the options alone. This increases the accessibility to report something that goes against the community guidelines.

3. What are your views on the safety measures and tools (paras 13 to 14) proposed to reduce exposure to harmful online content for Singapore-based users? Are there other measures that should be included?

Shadowbanning of adult content creators and sex workers causes more harm

It is definitely important to allow users to limit contact and interaction with other users (as described in para 13). However, some social media companies use this as an excuse to shadowban adult content creators and sex workers. Shadowbanning is a practice where social media platforms deprioritise and hide one's content to all users. In many cases, the user will not be shown if searched for through the search engine. While social media platforms deny this taking place, it can inherently harm users who use such social media platforms to generate their source of income.

We need to centre the well-being of adult content creators and sex workers too, as society continually demands their services. Rather than shadowbanning, give users the option to filter out adult content (like Starhub's junior filter). In other words, allow users to decide for themselves the kind of content they want to be exposed to - we need to recognise the agency of internet users and center their everyday lived experiences in how we police their access to knowledge regarding sex.

Cutting creators off from their source of income through the insidious way of shadowbanning makes it harder for them to market themselves. With limits in place, content creators may resort to other illegal means or they may be driven to where marketing is provided even when it is more dangerous (e.g. vice syndicates owned by gangs and secret societies who are not afraid of punishment because they have runners to do the dirty work).

Broad range of resources required

It is imperative to provide users with the autonomy to choose the form of support they want through the publication of a diverse set of resources. The need for sex-positive or sex-neutral resources, LGBTQ+ affirming resources, disability-centred resources is as important as the need for faith-based resources. Without providing the correct form of resources for help for the targeted groups, it wouldn't help resolve but may instead aggravate the situation further.

**PUBLIC CONSULTATION PAPER ISSUED BY THE
MINISTRY OF COMMUNICATIONS AND INFORMATION**

ENHANCING ONLINE SAFETY FOR USERS IN SINGAPORE

4. A key area of concern is protecting young users from the impact of harmful online content. Do you think the additional safeguards proposed for young users (paras 16 to 18) are appropriate and adequate? Are there other safeguards for young users that should be provided?

Many young people are already having sex and consuming sexual content before they turn 18.

As mentioned above, Durex found that many people learn about sex through pornography. In the same vein, local social workers have observed that teens are having sex at an earlier age, some even having multiple sexual partners (Tan, 2016). There were also reports on how more teens have been contracting STIs in recent years (Gan, 2020), along with statistical evidence that there has yet to be a significant decrease in the percentage of STIs among youths aged 10 to 19 years and 20 to 29 years, the latter of which being the age group with the highest STI percentage locally, since the MOE's abstinence-focused curriculum was implemented in the early 2010s (Department of Sexually Transmitted Infections Control, 2018).

There may be reasons for limiting porn to those at least 18 years old. But people start having sex before that (some as early as 12-14 years old). If they are going to do so, they need to be able to access sexually-explicit and educational material or run the risk of doing things they regret or that harms others.

As such, censorship of sexual content on social media sites is unlikely to be very effective at all in preventing knowledge about sexual acts to spread within the youth community. This has been referred to as the 'societal curriculum' of informal sex education for youths (Liew, 2014, citing Cortes, 1979)

A holistic educational approach to dealing with online harm

Protecting youths from sexual content and materials through abstinence-focused sex education has not been successful in steering them away from 'harm'. Through censorship of content on social media alone, it may not be sufficient as a safeguard from harm. To reiterate, we need to provide [comprehensive sexuality education \(as defined by the United Nations Population Fund\)](#) to our youths, and similarly recognise their agency as opposed to being paternalistic. We need to centre their everyday lived experiences, and acknowledge that there is quality research done on this topic locally. Only then, will we be able to curate an informed and educational approach for them to safely explore the internet.

Making child filters the default setting for all social media sites especially for those under 12

There are already mechanisms available to parents to prevent their children from accessing harmful or pornographic content online. This comes in the forms of parental controls on platforms such as Twitter and Youtube. For Twitter, the default setting is to not show explicit content unless it is disabled. This allows for social media users to firstly not get exposed to explicit content if they do not want to, secondly, it allows for the content creators to create content only for those that desire to be exposed to it. Social media platforms could emulate such practices already done and to make it the default choice as well which would allow for the freedom of exposure.

**PUBLIC CONSULTATION PAPER ISSUED BY THE
MINISTRY OF COMMUNICATIONS AND INFORMATION**

ENHANCING ONLINE SAFETY FOR USERS IN SINGAPORE

5. What do you think an effective and transparent user reporting mechanism (paras 19 to 21) should require? What do you expect the social media services to do after you have reported harmful content to such services?

24 hours or face significant penalties

In 2019, Justin Trudeau the Prime Minister of Canada called for new regulations for social media platforms where these platforms would have to remove illegal content, including hate speech, within 24 hours or face significant penalties. This should include other online harms such as radicalization, incitement to violence, exploitation of children, or creation or distribution of terrorist propaganda. (Office of the Prime Minister, 2019). We should consider this model because it makes removing harmful content an issue that affects their bottomline. We should also include other keywords such as “underage pornography”, “nonconsensual pornography”, “revenge porn”, and “stealthing”.

We need to fight the normalisation of image-based sexual abuse through encouraging the consumption of ethically produced adult content.

Recently, Straits Times published a table on The Sunday Times that shows how 6 different territories intend to deal with online harm with firms being fined up to a certain value or as a percentage of the global revenue. (Low, 2022). While that is useful, it does not solve the root of the issue where unconsensual pornography is being normalised in society. SG Nasi Lemak was not the first, nor will it be the last platform where the distribution and consumption of unconsensual pornography was celebrated. Punishing social media companies for not removing such harmful content in a timely manner is one way to tackle that. However, in our opinion, the best way to combat this epidemic is by encouraging the consumption of ethically produced adult content. This helps educate society that there is a distinction between consensual pornography and unconsensual pornography, and that we need to respect other human beings (adult content creators or not).

6. What can the community, the private sector and the Government do to enhance online safety for Singapore-based social media users? What are potential areas of collaboration?

- **Create a curriculum for pornography education.** Involve adult content creators and sex workers in the development of such curriculum as we know best the vulnerabilities of the online space, how to identify ethical pornography, and how to consume responsibly.
- Non-profit organisations like ourselves (Project X) are best placed to receive complaints and reports about unconsensual pornography, and we have received such complaints for the past 10 years. (Many people we work with

**PUBLIC CONSULTATION PAPER ISSUED BY THE
MINISTRY OF COMMUNICATIONS AND INFORMATION**

ENHANCING ONLINE SAFETY FOR USERS IN SINGAPORE

are too intimidated by the police to ask them for help, and it is helpful to have a proliferation of resources and avenues for help rather than just relying on one agency). The government can direct social media companies to work with us to create a **fast-track channel to request the immediate takedown of harmful content**. This is similar to the user-moderated model that Reddit has, and could speed up the removal process. Project X can thus be promoted as a hotline and resource for sex workers and adult content creators facing online harms.

- Government should strongly consider setting up a fund to **help victims of image-based sexual abuse to file DMCA takedowns** of their content on the internet. There should be a criteria for screening who is eligible to tap into these funds. An annual key performance indicator (KPI) should be set for the number of takedowns done per year, and this should be cross referenced with the police to see if the number is commensurate.
- Finally, and perhaps most importantly, there should be funds for community groups to **empower communities** to help deal with safety issues that arise among their own beneficiaries. Social media safety pilot projects and initiatives to demonstrate actual data (evidence-based) on what matters and what is effective should also be considered.

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**PUBLIC CONSULTATION PAPER ISSUED BY THE
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ENHANCING ONLINE SAFETY FOR USERS IN SINGAPORE

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