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Chief Executive and Secretary
3 January 2024

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Dear Dame Melanie,

The [Institution of Engineering and Technology](http://theiet.org) (IET) was pleased to see the Online Safety Bill receive its Royal Assent in October 2023 after careful scrutiny. However, media reports this week have highlighted that the concerns we and others have been raising around safeguarding in virtual reality (VR) spaces are already impacting vulnerable users and need to be reviewed as a priority. Ofcom has a crucial role in improving user safety online and we are happy to support this to ensure that the Online Safety Act is implemented effectively.

There are many benefits from the use of VR, particularly in engineering, education, health and social applications. However, it is equally clear that VR's immersive nature also poses unique risks, particularly for children and vulnerable groups: VR's embodied nature and psychological-realism is enabling new forms of abuse, including in metaverse environments.

Current harms identified include but are not limited to:

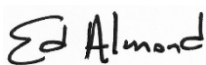
- Harassment and abuse, including sexual abuse
- Grooming and exploitation of children
- New forms of child sexual abuse material that are 3D and immersive in nature
- Mass extraction and commodification of data, including sub-consciously contributed biometric data, potentially in breach of users' right to mental privacy
- Ambiguity surrounding criminal accountability for individuals and publishers/platforms

The IET and voices from across industry, academia and civil society have worked hard to stress the importance of tackling such potential harm: in 2022 we published a report, [Safeguarding the Metaverse](#), highlighting our concerns and recommendations. We are keen to ensure that action is taken to minimise these risks.

It was confirmed in the House of Lords that governance of the metaverse is firmly within the scope of the Online Safety Act. **Therefore, we believe that the best way to minimise risks and protect vulnerable users from harm is for Ofcom to undertake an urgent review of how VR spaces are governed.** Given the seriousness of the offences being committed and the rapid technological developments, we feel that such a governance review is too important to be scheduled for consideration as part of a periodic review process.

The IET is committed to enhancing online safety and we would be very pleased to discuss these matters further with Ofcom. We look forward to working with you.

Yours sincerely



Ed Almond
Chief Executive and
Secretary of the IET



Verity McIntosh
Associate Professor of Virtual
and Extended Realities (UWE)



Catherine Allen
CEO and Lead Consultant
of Limina Immersive