



Google UK Limited

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Private & confidential

Mr Paul Rogers
Inner West London Coroners Court
33 Tachbrook Street
London
SW1P 2EP

By post and email: [REDACTED]

13 February 2024

Dear Paul Rogers,

Regulation 28 - Prevention of Future Deaths (Chloe Elizabeth MacDermott)

We refer to your Report on the Prevention of Future Deaths dated 19 December 2023 ("**the Report**"). This letter serves as a formal response to the queries and points raised within the Report.

We are deeply saddened to hear of the tragic circumstances relating to the death of Chloe Elizabeth MacDermott. We understand from the Report that prior to her death on 23 May 2021, Ms MacDermott researched ways to end her life using the internet and internet chat rooms, including a specific site [REDACTED] ("**the Site**"). The Report highlights that the Site is a forum that permits material to be exchanged and viewed within chatrooms, including the exchange of information and methods of suicide. Further concerns are raised in the Report, including the lack of age restrictions on the Site, the lack of prominent self-help signposting on the Site and the lack of content moderation on the Site. It is unclear from the Report whether Ms MacDermott used Google Search (or another search engine) to find the Site; nevertheless, we would like to take this opportunity to set out Search's approach to keeping users safe from harmful and illegal suicide and self-harm content.

Google Search serves as an index of information on the open web. When an individual enters a search query, it uses algorithms to return search results linking to the relevant web pages in the index, ranked from most to least relevant. Safety is core to how Google develops and operates its services, and we understand our responsibility to keep users safe, while still ensuring the free flow of information. As with all of our search ranking systems, we're continually making improvements to ensure that we're providing people with the highest quality information possible, while also not showing people shocking or potentially harmful results that they are not explicitly seeking.

In relation to suicide and self-harm content, we take a combination of approaches, including (i) prohibiting policy violative content in Search features; (ii) providing information and resources via hotline oneboxes; and (iii) providing specialised ranking approaches for suicide and self-harm queries. We set out more detail on these measures below.

We note that people use Search for suicide-related queries for many different reasons, including looking for support to manage their thoughts in moments of crisis, or seeking information as to how to support



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loved ones. We recognise how important it is to increase awareness around help-seeking behaviours, while decreasing risk-taking and reducing stigma. We have therefore developed the measures below through extensive consultation with both internal and external experts in psychology, mental health, and related areas. These include not only academics and clinicians, but also practitioners who provide direct services to vulnerable populations.

We also note that some of these measures have been implemented since May 2021, as we are continually evolving our processes in response to information, like user behaviour and sensitive content types, to ensure we are promoting authoritative and trusted content, while demoting content that could be harmful to users. We also recognise the importance of implementing robust systems and processes that provide our users with a level of protection that surpasses legal requirements.

Policies and processes relating to suicidal content on Google Search

We are aware of the prevalence of user-to-user pro-suicide forums and the danger they pose. This means that we adopt a variety of measures to keep users safe from this type of content.

- Where Search receives a valid removal request under UK law, Google will delist the URL from the search results. The removal process we employ involves taking down URLs that are visible on Search. Our URL removal process is designed to target specific URLs that appear on our Search results, rather than implementing a blanket removal for entire domains. This approach allows us to address individual URLs that may contain unlawfully-published content while preserving the accessibility of valuable and relevant information on the internet. For the avoidance of doubt, if Google were to receive a valid removal request relating to a URL featuring on the Site and it was determined to be illegal under UK law, the URL would be delisted.
- Content that promotes or glorifies suicide or self-harm can often fall into the category of legal but harmful, rather than illegal. Our ranking algorithms consistently classify these types of suicide forums as low quality, meaning that they will not feature highly in search results, particularly in response to general suicide-related queries. Conversely, higher quality results and information bars will be promoted (such as links to the Samaritans, NSPCC and other relevant charities). By integrating links and phone numbers on Search to reputable mental health organisations, Google Search aims to make it easier for users to seek help and guidance when they may need it. We note that, as it stands, the Site does not rank highly in Search for general queries related to self-harm or suicide.
- As a further measure to support both vulnerable users and the organisations they turn to for help, Google Search has taken proactive steps by working with the Samaritans to implement “OneBoxes” which display prominently in response to suicide-related queries. These information boxes are designed to provide users with quick and easy access to authoritative resources and support for mental health needs, including a 24 hour helpline and links to the Samaritans’ official website. We also note that when users search specifically for the Site, our systems will surface this Samaritans OneBox, with a phone number for national hotlines.
- Google Search also enforces content policies on Search features, such as Autocomplete predictions, to prevent surfacing dangerous content and we design our systems to avoid



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showing violative predictions. We don't allow content that could directly facilitate serious and immediate harm to people (such as content that promotes self-harm, or content that provides instructions on committing suicide).¹ This means that Google will not predict a search query such as "how to commit suicide". In response to concerns about this Site, Google will also not predict a search query for the Site or the specific method of suicide mentioned in the Report (e.g. by predicting "sanctioned suicide" or "suicide sodium nitrate").

As outlined above, many websites featuring suicide content are not necessarily currently illegal under UK law, and nor are search engines required by law to delist them. Google strongly supports the objectives of the Online Safety Act 2023 ("OSA"), which will give the industry regulator, Ofcom, enforcement powers against user-to-user services (like the Site) where such services do not have sufficient systems and processes to protect users from illegal content or children from content that is harmful to them. The regime will also give clarity over circumstances where search engines will be required to minimise users' access to certain content.

Google remains committed to continually improving services to prevent users from finding and experiencing harmful content, whilst also providing users with authoritative information on wide ranging topics.

To the extent that you have any specific queries about Google Search please direct them to Google LLC, the entity that provides this service on behalf of UK users. Google LLC is a US company incorporated in Delaware, with its principal place of business at 1600 Amphitheatre Parkway, Mountain View, California, CA 94043, United States. Otherwise, if we can be of any further assistance on this matter, please do not hesitate to contact us.

Yours faithfully

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Legal Department
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¹ <https://support.google.com/websearch/answer/10622781?hl=en>