

## Singapore: Further details released on safety measures proposed for social media platforms

The Ministry of Communications and Information (MCI) has released, in its [Public Consultation](#) published on 13 July 2022, more information on two proposed complementary codes to protect Singapore-based users against harmful and high-risk online content.

### In brief

Social media platforms with significant reach or impact that are designated social media services will be in-scope for the new compliance obligations proposed by the MCI under the Code of Practice for Online Safety and all social media services are intended to be subject to the Content Code for Social Media Services (collectively, "**Codes**").

During MCI's earlier consultation with the industry, we have provided information about these Codes in our alert: [Government proposes Codes of Practice to regulate harmful online content on social media](#). As noted in our earlier alert, the Code of Practice for Online Safety targets user-protective processes which these designated social media services should have in place; and the Content Code for Social Media Services will grant IMDA powers to issue directions to disable harmful content or disallow accounts from interacting with users in Singapore.

The Public Consultation runs until 10 August 2022.

In this Alert, we summarise the protective measures released by the MCI in its summary of the Code of Practice for Online Safety and the Content Code for Social Media Services and provide some of our takeaways.

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### In more detail

#### Proposed compliance obligations

Designated in-scope social media services will be required to implement measures proposed by the Code of Practice for Online Safety, which we summarise below.

These measures are broadly categorised into three categories of requirements:

- User Safety
- User Reporting and Resolution
- Accountability

Additional safeguards to protect the safety of young users have also been proposed.

The purpose of these measures is to address concerns over harmful content that can reach a wide audience or be targeted at specific groups of users and be amplified through social media services.

While MCI recognises that social media services may already have in place measures to protect their users, such measures may vary from service to service. Another driver behind the code seems to be a desire for Singapore's unique sociocultural context to be taken into account when evaluating harmful content, and to do more to protect young users.



## User Safety

### Code-compliant community standards

MCI will require community standards for the following categories with specific enhanced standards for young users:

All users	Young users
Sexual content	Context that depicts sexual activity even in fictional context, implied or obscured depictions of sexual activities, nudity in sexual context, frequent use of sexual references or innuendoes intended for sexual gratification
Violent content	Implied or obscured depiction of violence, gore, abuse or torture
Self-harm content	Implied or nondetailed depictions of self-harm, e.g., healed scars, blurred visuals Content encouraging or providing instructions on how to engage in dangerous acts that could result in physical harm
Cyberbullying content	Content that is likely to mock, humiliate or cause embarrassment to the target person
Content endangering public health	
Content facilitating vice and organised crime	

Further examples of content that falls within each category are provided at [Annex A – Illustrative and Non-Exhaustive Examples of Harmful Content in Relation to User Safety, and Additional Safeguards for Young Users](#) (Annex A) of the consultation.

### Content moderation

Designated social media services will additionally be required to do the following:

- Moderate content to reduce users' exposure to such harmful content, for example, disabling access to such content when reported by users
- Proactively detect and remove child sexual exploitation and abuse material, and terrorism content

### Self-help tools and options

Designated social media services are expected to provide users with tools and options to manage their own exposure to unwanted content and interactions, which may include tools that allow users to:

- Hide unwanted comments on their feeds
- Limit contact and interactions with other users

### Provision of safety information and contacts

Designated social media services may be expected to provide safety information to users which could include Singapore-based safety resources and contacts to local support centres that are easily accessible to users.

It has also been proposed that relevant safety information (for example, helplines and counselling information) is pushed to users that search for high-risk content such as content related to self-harm or suicide.

### Additional measures and safeguards for young users

MCI's expectations for additional safeguards include:

- Stricter community standards for young users
- Tools that allow young users or parents/guardians to manage and mitigate young users' exposure to harmful content and unwanted interactions, such as tools that do the following:
  - Limit the visibility of young users' accounts to others, including their profile and content



- Limit who can contact and/or interact with accounts of young users
- Manage the content that young users see and/or experience
- Guidance to young users and parents/guardians on how to protect young users from content that is harmful or age-inappropriate, and from unwanted interactions
- Such guidance provided to young users should be easy to access and understand

For services that allow users below 18 to sign up for an account, and to ensure the comprehensive and targeted application of these enhanced measures, the MCI will expect the following:

- Default activation of these safeguarding tools
- Where young users and parents/guardians choose settings which weaken these safeguards, warnings to be displayed as to the implications of such choices

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## User Reporting and Resolution

### User reporting and resolution process

If users come across harmful content despite safeguards, designated social media services will be expected to provide an efficient and transparent user reporting and resolution process to enable users to alert these services to content of concern.

The reporting mechanism should:

- Be easy to access and use
- Allow users to report harmful online content to the social media service
- Allow the designated social media service to assess and take appropriate action on user reports in a timely and diligent manner

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## Accountability

### Annual compliance reporting

Designated social media services will be expected to prepare annual reports containing:

- Their content moderation policies and practices
- The effectiveness of their measures in improving user safety

IMDA will publish these annual reports to provide the public with a better understanding of how their exposure to harmful content is reduced on the services they use.

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## Content Code for Social Media Services

The Code of Practice for Online Safety is intended to apply to designated social media services with significant reach or impact, and expected to deal with most of the harmful online content that Singapore users may encounter when engaging social media services. The Content Code for Social Media Services is intended to apply to all social media services in order to address residual instances where extremely harmful content remains available online.

The Content Code for Social Media Services will allow IMDA to direct any social media service to disable access to specified harmful content for users in Singapore, or to disallow specified online accounts on the service from communicating content and/or interacting with users in Singapore.

The types of content that are intended to fall within the ambit of this Content Code for Social Media Services are content that relates to the following:

- Suicide and self-harm
- Sexual harm
- Public health
- Public security
- Racial or religious disharmony or intolerance



## Takeaways

The Codes are intended to address different concerns compared to existing laws such as:

- The Protection from Harassment Act 2014, which addresses harassment
- The Protection from Online Falsehoods and Manipulation Act 2019, which addresses misinformation and disinformation
- The Foreign Interference (Countermeasures) Act 2021, which addresses foreign interference

While the Internet Code of Practice presently applies to all Internet Content Providers (as defined in the Broadcasting (Class Licence) Notification), we expect that the provisions in the Codes to be more directed towards social media services.

The intent is not to provide for a particularly prescriptive approach, but to drive certain outcomes set out in these Codes. The Minister for Communications and Information and Second Minister for Home Affairs, Josephine Teo, has expressed willingness to understand how the proposed codes will work in the specific context of each designated social media service and see whether adjustments will need to be made in the way the code is designed.

Designated social media services and social media services may wish to consider the following measures:

- Assess whether their present policies and processes are adequate to comply with the requirements proposed by the Codes. In particular:
  - As the Code of Practice for Online Safety does not provide for 'safe harbour' provisions, designated social media services may wish to consider if the inclusion of suitable illustrations and examples of adequate or good practices will help provide clarity and comfort as to the adequacy of present practices.
  - Social media services that need to comply with the Content Code for Social Media Services may wish to consider if their systems and processes are able to identify and disable harmful content if specified (especially if such content is shared or reposted), and able to identify users in Singapore to enable specified online accounts to be blocked from access by users in Singapore.
- Adopt new, or revise existing, terms of engagement with its users to enable the platform to take necessary action to prevent or counter the online harm scenarios illustrated in [Annex A – Illustrative and Non-Exhaustive Examples of Harmful Content in Relation to User Safety, and Additional Safeguards for Young Users \(Annex A\)](#) and [Annex B – Illustrative and Non-Exhaustive Examples of Extremely Harmful Content That May Require Access to Be Disabled for Users in Singapore \(Annex B\)](#)

Additionally, from the [discussion between the Minister for Communications and Information and technology companies](#) during the earlier industry consultation, we note that the Singapore government intends for the Codes to have regulatory effect with teeth, resulting in legal consequences for breaches to the Codes.

Please reach out to us if you have any questions in relation to the matters set out above.



## Contact Us



**Andy Leck**  
Principal  
[andy.leck@bakermckenzie.com](mailto:andy.leck@bakermckenzie.com)



**Ken Chia**  
Principal  
[ken.chia@bakermckenzie.com](mailto:ken.chia@bakermckenzie.com)



**Ren Jun Lim**  
Principal  
[ren.jun.lim@bakermckenzie.com](mailto:ren.jun.lim@bakermckenzie.com)



**Abe Sun**  
Principal  
[vasan.abe.sun@bakermckenzie.com](mailto:vasan.abe.sun@bakermckenzie.com)



**Alex Toh**  
Local Principal  
[alex.toh@bakermckenzie.com](mailto:alex.toh@bakermckenzie.com)

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