
Freedom of Information Act Publication Scheme

Protective Marking	Official
Publication Scheme Y/N	Y
Title	Online Harm Referral Team – Standard Operating Procedure (SOP)
Version	2.2
Summary	SOPs to provide clear guidance to Open Source users around the processes and standards necessary within the Online Harm Referral Team
(B)OCU or Unit, Directorate	MO2 – Project Alpha
Run/Change	
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Date Issued	11 th June 2025
Review Date	11 th June 2026

Online Harm Referral Team

Standard Operating Procedure (SOP)

1. Purpose

- 1.1. The purpose of this SOP is to provide guidance to officers working within the Online Harm Referral Team (OHRT) of Project Alpha. The intention is to ensure compliance with the Data Protection Act 2018 (DPA), Equality Act 2010, Regulation of Investigatory Powers Act 2000 (RIPA) and law enforcement guidance and policy relating to open source investigation and the processing and retention of data.
- 1.2. Within Met policy any reference to male, female, women, man, girl and boy refers to biological sex. Any reference to trans male, trans female, trans women, trans man, trans girl and trans boy refers to someone who has the protected characteristic of gender reassignment. An individual who is protected by the Equality Act for reason of gender reassignment is protected regardless of whether they are proposing to undergo, are undergoing or have undergone a process (or part of a process) for the purpose of reassigning their sex by

changing physiological or other attributes of sex. Individuals that identify as transgender and/or non-binary is inclusive of where they have no plans to undergo gender reassignment surgery. Whilst some definitions relating to an individual's protected characteristics are likely to remain unchanged, the language in this policy is under review with the aim of making it fully inclusive.

1.3. This SOP sets out:

- 1.3.1. An introduction to the Online Harm Referral Team;
- 1.3.2. Who the SOP applies to;
- 1.3.3. Relevant definitions in SMH/CLSMIN work;
- 1.3.4. Training Requirements;
- 1.3.5. Information Security;
- 1.3.6. Governance and Auditing;
- 1.3.7. Tasking Process;
- 1.3.8. Content Review & Assessment;
- 1.3.9. Referral process to platforms;
- 1.3.10. Reference Material and Applicable Guidance;
- 1.3.11. Consultation; and
- 1.3.12. Change History

2. Introduction

- 2.1. Project Alpha's OHRT has responsibility for reviewing identified material online & making referrals to social media & streaming platforms for their consideration to take appropriate action. The material in scope is where it is considered that the content may be inflammatory or could provoke a real world act of violence. The content is usually legal but harmful material and does not constitute a criminal offence in itself, in these cases the MPS has no power to enforce removal of the content, and removal is a decision made by the platform.
- 2.2. The OHRT captures the details of referrals & the content, so that it is retained for a period of 12 months should it become relevant to a subsequent act of serious violence & corresponding criminal investigation/prosecution.

- 2.3. In furtherance of the priority of tackling serious youth violence, the MPS launched Operation Domain in 2015 to identify online material which posed a risk of escalating community tensions and/or provoking real world acts of violence. Operation Domain was established under the governance and oversight of the Met Intelligence Command (MO2).
- 2.4. In June 2019, the MPS & Home Office established a new project to improve the capability of UK policing in gathering intelligence and evidence online, with specific focus on the growing use of social media applications & platforms. Project Alpha was established and inherited responsibility for Operation Domain, now called the Online Harm Referral Team.
- 2.5. A review of the activities of the OHRT was conducted in 2023/24 resulting in the current approach detailed in these SOPs. The review considered the proportionality of the approach, efficiency/prioritisation of resources, the implementation of the Online Safety Act and a corresponding reduction in the volume of online musical content deemed to be harmful. Subsequently, the OHRT only reviews content referred to the unit from across the MPS that may be a contributing factor to real world violence. The OHRT does not proactively review any type of online content.

3. **Application of SOP**

- 3.1. The scope of this SOP is the operational activity of the OHRT and OHRT supervisors employed within Project Alpha. The specific areas of activity covered by this SOP are:
 - 3.1.1. The referral of harmful online content to platforms.
 - 3.1.2. Capture and dissemination of open source material in support of a criminal investigation.
- 3.2. The OHRT will be responsible for reviewing and assessing online harmful content and where appropriate making a referral to a social media platform on the basis that the content is harmful and likely to have breached the platform's own Terms of Service.

- 3.3. Whilst referred to in this SOP and utilised by staff working within the OHRT, the procedures relating to the Trusted Flagger system operated by Google are outside the scope of this SOP.
- 3.4. This SOP applies to all police officers and police staff, including the extended police family and those working voluntarily or under contract to the Mayor's Office for Policing and Crime (MOPAC) or the Commissioner, who must be aware of, and are required to comply with, all MPS policy and associated procedures.
- 3.5. However, this SOP applies in particular to officers and staff in the following roles:
- 3.5.1. All operational staff employed on the MO2 - Online Harm Referral Team
 - 3.5.2. All operational staff employed on the MO2 – Social Media Hub
 - 3.5.3. All operational staff employed on the MO2 – County Lines Social Media Intelligence Network
 - 3.5.4. All operational staff employed on BCU Gang units
- N.B. This list is not intended to be exhaustive.*
- 3.6. A summary of the roles and responsibilities relevant to this SOP follows:
- 3.6.1. OHRT Police Constables – following the processes detailed in this SOP for downloading and logging online content and the referral/removal of harmful online content.
 - 3.6.2. OHRT first line manager – quality control review of each referral for removal of content prior to submission to platform
 - 3.6.3. OHRT supervisors (Sergeant, Inspector and Chief Inspector) – ensure OHRT adherence to this SOP through oversight, governance and dip sampling processes detailed within the SOP.

4. Definitions

4.1. Definitions of terms used within this SOP.

- 4.1.1. **Social Media Hub (SMH)** – a team of officers within the Met Intelligence Operational Command Unit who provide specialist

support and expertise in social media and online platforms to operational teams for the investigation of offences relating to serious youth violence and organised criminality.

- 4.1.2. **The County Lines Social Media Intelligence Network (CLSMIN)** - a team of officers within the Met Intelligence Operational Command Unit who provide specialist support and expertise in social media and online platforms to operational teams for the investigation of offences relating to county lines.
- 4.1.3. **The Online Harm Referral Team (OHRT)** – a team of officers within the Met Intelligence Operational Command Unit who review open-source online material, identifying harmful content and making referrals to social media platforms for consideration of removal of the content where it breaches the platform’s terms of service.
- 4.1.4. **Social Media Platforms** – some popular online platforms do not deem themselves to be social media applications, to avoid any doubt or confusion within this SOP this refers to all social media, photo sharing, messaging, community applications. This list includes, but is not exclusive to, the following platforms:
- Facebook
 - You Tube
 - Instagram
 - Snapchat
 - Twitter
 - WhatsApp
 - Telegram
 - Reddit
 - TikTok
- 4.1.5. **Terms of service** – platforms and channels use differing terminology to describe the conditions governing the use of their platform, such

as terms of service or community guidelines. For ease of reference within this SOP such conditions will be referred to as Terms of Service.

4.1.6. **Harmful online content** – no legal definition of harmful online content currently exists, in general terms harmful content is anything online which causes a person distress or harm. Given the large volume and range of online content it is not possible to provide an exhaustive list of content that would be considered within the OHRT terms of reference, however the focus is on the prevention of serious violence, gang related criminality and exploitation of young and vulnerable people. Examples of the type of content within the terms of reference for the OHRT are as follows:

- Online sales of illegal commodities, e.g. prohibited weapons, controlled drugs
- Content likely to provoke a real world act of violence, e.g. taunting/goading of rival gang members
- Inflammatory/distressing content with association to serious youth violence, e.g. mocking the death/serious injury of a rival associate
- Content that highlights concerns of exploitation of a child or vulnerable person.

4.1.7. **Internet Intelligence & Investigations (III or i3)** – defined as the use of internet resources to gather information, intelligence and evidence.

4.1.8. **Connect** – MPS computer system on which crime, intelligence and missing person reports have been recorded since February 2024.

5. Training.

5.1. All officers employed within the OHRT to have completed the following training within their first six months:

5.1.1. Intermediate III Operative – essential training prior to deployment.

- 5.1.2. Advanced III Operative – within first 12 months.
 - 5.1.3. Social Media Operatives Course – within first 3 months
 - 5.1.4. Trusted Flagger input provide by Google.
- 5.2. All training to be conducted by an MPS approved training provider.
- 5.3. All officers and staff employed within Project Alpha to have completed the following College of Policing E-Learning packages:
- 5.3.1. Managing Information: Operational
 - 5.3.2. Human Rights Act
 - 5.3.3. Equality Act
- 5.4. In addition to the training listed above all officers employed within OHRT to have read and familiarised themselves with the internal policy and guidance documents listed in paragraph 12.2.

The OHRT supervisors are responsible for ensuring all officers employed on the unit are appropriately trained and have familiarised themselves with this SOP and internal policy and guidance documents listed in paragraph 12.2 as part of the induction process for the unit.

6. Information Security

- 6.1. The activities of the OHRT are subject to a [Data Protection Impact Assessment](#).
- 6.2. In relation to the acquisition, storage, retention and deletion of data all OHRT operatives are to be familiar with and adhere to the [Project Alpha Data Handling Policy](#).
- 6.3. All sensitive material produced by the OHRT is only to be shared with other UK law enforcement agencies for a policing purpose as detailed in the [Police Information and Records Management Codes of Practice](#) and the [College of Policing's Information Management Authorised Professional Practice](#). All sensitive material shared by the OHRT is to include clear handling instructions

identifying how the shared material can be used and/or stored in line with [College of Policing Intelligence Management Authorised Professional Practice](#).

- 6.4. All data to be shared outside of law enforcement agencies must have all sensitive information and personal data removed from the content. Data shared with social media platforms should only include information obtained from the content itself and information publicly available.
- 6.5. Anonymised performance data may be shared for the purposes of monitoring progress by the Home Office.

7. Governance

- 7.1. The OHRT is a function of Project Alpha which is a part of the Met Intelligence Operational Command Unit (MO2), MO2 falls under the responsibility of the Deputy Assistant Commissioner for Intelligence & Covert Policing.
- 7.2. The OHRT provide quarterly reports to the Home Office summarising performance of the unit against agreed Key Performance Indicators and information on financial expenditure.
- 7.3. Acceptance of Home Office grants and continuation of the Project is subject to approval by both MPS Management Board via the Executive Committee and MOPAC via the Investment Advisory and Monitoring meeting.
- 7.4. The activities of the OHRT are subject to a [Data Protection Impact Assessment](#) and an [Equalities Impact Assessment](#).
- 7.5. Dip sampling of cases to ensure accuracy of data recording, quality of review and compliance with this SOP take place quarterly led by an officer of rank of Inspector (dip sampling 5% of deployments.) The dip sampling takes place quarterly and results are recorded and fed back to operatives and line managers.

8. Tasking Process & Record Keeping

- 8.1. OHRT activity is tasked through referrals submitted via the Project Alpha Power App by officers/staff from across the MPS.
- 8.2. All tasks conducted by OHRT operatives are to be recorded within the Project Alpha Power App portal.
- 8.3. Referrals submitted via the Power App must include the following details as a minimum standard:
 - 8.3.1. Applicant details – name, OCU, unit
 - 8.3.2. Date of content upload
 - 8.3.3. Incident reference (where applicable) - Connect, CAD, Cris, Crimint, Merlin, APMIS
 - 8.3.4. Title of content
 - 8.3.5. Content URL
 - 8.3.6. Platforms/channels hosting content
 - 8.3.7. The rationale for referral to the OHRT
- 8.4. In addition to mandatory information the applicant must also record, where relevant:
 - 8.4.1. Details of any subjects linked to the referral, where known
- 8.5. The OHRT operatives will record the result of all referrals and self-tasked deployments within the Project Alpha Power App portal.
- 8.6. The OHRT operatives must record the following details when closing a Power App record as a minimum standard:
 - 8.6.1. Date of content review
 - 8.6.2. Outcome of review – referred to platform or no further action
 - 8.6.3. Date of referral to platforms
 - 8.6.4. Details of which platforms for referral
 - 8.6.5. Basis of referral request to platforms
 - 8.6.6. Format of online content.

9. Content Review & Assessment

- 9.1. The OHRT capture the online content using audio/video conversion software transferring the content to a standalone computer. A detailed review of the content's audio and video tracks are conducted by the OHRT using video analysis software to assist.
- 9.2. Factors taken into consideration in making a determination of "harmful content"*
(**non-exhaustive*):
- 9.2.1. Identification of the subjects/persons within the content, suspected of being affiliated to an Organised Crime Group, or Gang
 - 9.2.2. Existence of previous incidents & criminal offences (e.g. homicides, shootings, stabbings) which have taken place between two Organised Crime Groups or Gangs
 - 9.2.3. Words or language used within the content which is considered to be inflammatory, highly distasteful or provocative in nature, that could reasonably be considered to provoke an act of real world violence in retaliation with regard to the context;
 - 9.2.4. Acts of humiliation
 - 9.2.5. Words, acts or conduct likely to have an adverse impact on public safety and/or lead to public disorder.
 - 9.2.6. Sales of illegal commodities, e.g. prohibited weapons, controlled drugs
 - 9.2.7. Concerns of exploitation of a child or vulnerable person.
- 9.3. OHRT officers conduct research against police indices hosted on Aware to identify relevant incidents or intelligence involving the persons/subjects within or associated to the content.
- 9.4. OHRT officers review the content alongside the relevant platform's terms of service to identify whether these terms have been breached by the content. Details of the review are recorded within the OHRT Power App.

10. Referral Process to Social Media Platforms

10.1. A referral to the relevant platform will be drafted by the OHRT officer in line with the referral template.

10.2. The referral is reviewed by the OHRT sergeant for quality assurance (QA).

10.3. The OHRT will record the outcome of the review & assessment decision on the Power App entry:

10.3.1. Content assessed as harmful and in breach of terms of service – referral made to Social Media Platform; OR

10.3.2. Content assessed as not harmful or not in breach of terms of service – no further action.

10.4. In the event that content is subject to a referral to a platform and intelligence record is to be made within Connect detailing:

10.4.1. Title of content

10.4.2. Content URL

10.4.3. Platforms/channels hosting content

10.4.4. The rationale for referral to the platform

10.4.5. A brief summary of the nature of the content

10.4.6. Details of the breach of the platforms terms of service

10.5. Each social media platform or music streaming service operates their own mechanism for receiving referrals for the removal of online content. The current details for each platform are held within the Project Alpha Box folders but there are currently three processes operated by the platforms:

10.5.1. Trusted Flagger scheme – a secure portal operated by Google for the submission of referrals for removal of online content hosted on Google platforms, e.g. YouTube. OHRT officers use a single account login to access the portal.

- 10.5.2. Mailbox – OHRT officers email referral to a mailbox, currently used by Instagram and TikTok
 - 10.5.3. Individual – OHRT officers email referral to a named individual at the platform.
- 10.6. The OHRT will record the decision of the Social Media Platform on both the Power App entry and the Connect intelligence report:
- 10.6.1. Content assessed as in breach of Social Media Platform’s Community Guidelines & taken down; OR
 - 10.6.2. Content assessed as not in breach of Social Media Platform’s Community Guidelines & not taken down.
- 10.7. In the event that the platform deems content not to be in breach of the platform’s terms of service & therefore not taken down, the OHRT will review the referral and consider an appeal against this decision.
- 10.8. Where content is removed from a platform and consists of musical content, a record of this content is added to the OHRT “Domain” library and retained for a period of 12 months. The Domain library is an index of removed musical online harmful content and includes the same information as recorded within the Connect intelligence record. If the stored content is relevant to an ongoing criminal investigation it will be retained in line with the Criminal Procedure & Investigation Act 1996 and MPS data retention guidance, otherwise the content is deleted after 12 months.

11. Forms/Templates Used

11.1. [OHRT Referral template](#)

12. Reference Material & Applicable Guidance

12.1. This is not an exhaustive list of policies and guidance applicable to SMH/CLSMIN. Other policies or guidance that are applicable to all aspects of MPS's work remain applicable.

12.2. Internal

- 12.2.1. [MPS Minimum Standards for Investigation or Research over the Internet](#)
- 12.2.2. [MO5 Online Covert Research & Investigation – Legal & Procedural Guidance](#)
- 12.2.3. [Project Alpha Data Handling Policy Document](#)
- 12.2.4. [Project Alpha Connect Intelligence guide](#)
- 12.2.5. [Project Alpha – THRIVE+ on Connect](#)

12.3. External

- 12.3.1. [NPCC Internet Intelligence and Investigations Strategy](#)
- 12.3.2. [Data Protection Act 2018](#)
- 12.3.3. [Equality Act 2010](#)
- 12.3.4. [Human Rights Act 1998](#)
- 12.3.5. [College of Policing Management of Police Information – Authorised Professional Practice](#)
- 12.3.6. [Police Information and Records Management Codes of Practice](#)
- 12.3.7. [College of Policing Intelligence Management – Authorised Professional Practice](#)
- 12.3.8. [YouTube Terms of Service](#)
- 12.3.9. [YouTube Community Guidelines](#)
- 12.3.10. [Instagram Terms of Use](#)
- 12.3.11. [Instagram Community Guidelines](#)
- 12.3.12. [TikTok Terms of Service](#)
- 12.3.13. [TikTok Community Guidelines](#)
- 12.3.14. [Facebook Terms of Service](#)
- 12.3.15. [Facebook Community Guidelines](#)

13. Consultation Table

Name	Department	Date Consulted	Comments
██████████	Directorate of Legal Services	Apr 2023	
██████████████████	SOC HQ SLT	Jun 24	

14. Change History

SOP no.	Effective Date	Significant Changes	Previous SOP no.
Version 1.0	08/02/2023	First version	N/A
Version 2.0	11/12/2023	Updates in processes for reviewing content, referral based review rather than proactively reviewing specific content types. Amendments in response to legal advice.	1.0
Version 2.1	25/06/2024	Further information added regarding data handling and training and final sign off by SOC HQ SLT.	2.0
Version 2.2	11/06/2025	Addition of paragraph 1.2 following Supreme Court ruling on definition of a woman and amendment of OCU following Project Alpha move to MO2.	2.1