

Online Harms White Paper Consultation – Response From The Lucy Faithfull Foundation

Our expertise

The Lucy Faithfull Foundation is a child protection charity. Since 1992 we have used our extensive knowledge of child sexual abuse, including our understanding of abuser behaviour and prevention theory and practice, to deliver targeted, evidence-based interventions that keep children safe online and offline. We work with entire families that have been affected by sexual abuse including young people who have exhibited harmful sexual behaviours; adult male and female sexual abusers; victims and survivors of abuse, and other family members.

Our vision is a world in which children's right to live free from abuse and exploitation becomes a reality. Our mission is to prevent the sexual abuse of children and young people by working with protective adults, those affected by abuse and those perpetrating it, including young people with harmful sexual behaviour. We are committed to using our expert knowledge to impact on public policy, and to educate families, professionals and the public. We help children and young people to stay safe online and offline in all our work.

Our staff come from various backgrounds and disciplines. Our UK-wide practitioner team includes professionals who have worked in the child sexual abuse field for a range of statutory agencies. It includes psychologists, psychotherapists, former probation and police officers, and social workers.

We provide a range of services for organisations, professionals and the public including risk assessments and intervention; specialist consultancy; expert training and public education. We work with organisations, individual professionals and those who work with children and families, and members of the public. The aim of this work is to prevent sexual abuse of children ever or again.

Our confidential Stop It Now! helpline, available for anyone with concerns about child sexual abuse, receives around 800 calls a month. A large proportion of calls are from people who have committed online sexual offences, or from their family members. In 2017/18, 41% of people who contacted us were people who had accessed illegal images of children online (2,184 people). Of these callers, 10% had neither been arrested for this offence nor were they under investigation. Giving these callers an anonymous way to get help with their behaviour gives us a unique insight into the behaviour of those who are offending online and have not yet been arrested. We also receive calls related to young people who have got into trouble for their online behaviour, or are worried about their thoughts or behaviour – we took 213 of these calls last year.

Our websites offer support and advice for those concerned about online sexual behaviour including self-help tools: get-help.stopitnow.org.uk for those concerned about their online behaviour, or that of a loved one, had 48,987 users last year.

We deliver a range of programmes designed to prevent further online sexual offending, including Inform Plus for people who have been arrested, cautioned or convicted for internet offences involving indecent images of children. Around 250 men complete this programme each year. Our Inform Programme is a course for partners, relatives and friends of anyone who has been accessing indecent images of children online. Our Inform Young People's Programme is a psycho-educational programme for young people, along with their parents, who have been in trouble with the police, their school or college for inappropriate use of technology and the internet.

The problem

There is the potential for any child to be at risk of sexual abuse and online platforms will always be targeted to facilitate this. The challenge is how best to prevent harm now and in the future.

Online platforms are being used to conduct child sexual abuse right now. People around the world can live-stream sexual abuse of children to order. Children are being groomed online, coerced into harming themselves sexually or meeting abusers offline. And images of child sexual abuse circulate online long after the physical harm has ceased, re-victimising children throughout their lives. This abuse causes substantial emotional and physical harm to children.

The primary purpose of governments is to protect their citizens in the short and long term, online and offline. Currently, companies that provide online platforms have obligations to their shareholders rather than their users. Public pressure can make a difference but will only go so far due to increasing audience numbers and short memory and attention spans of news cycles. Online platforms therefore need to be regulated through legislation that requires them to safeguard children – offline companies have legal duties of care and this should extend to the online space. Therefore we welcome the white paper’s proposal for legal expectations to be placed on companies, alongside the creation of clear independent regulation.

But society can also do more. Children have greater access to online technology and at a younger age than ever before. They and the adults responsible for their welfare need to be properly equipped to deal with online harms.

Anything less than the strongest and quickest action will cause more real harm to more children – this is not a theoretical debate.

Recommendations

1. To provide high quality education to children on how to stay safe online, that is properly funded and has sufficient time dedicated to it.
2. To provide a single, trusted source high quality resources to parents, carers and professionals.
3. To fund resources to deter and educate people who are at risk of committing risky/illegal behaviours online; to properly evaluate these; and to research how best to target them, including careful messaging for vulnerable users.
4. To fund research into, and application of, messages and interventions that target ‘bystanders’.
5. To consider additional safeguarding measures for high-risk spaces and situations that need special attention, such as platforms that host younger users or encourage particular behaviours.
6. To coordinate activities in the open and dark web to better understand and prevent risky/illegal behaviours.
7. To educate the public as to where real risks lie in terms of child sexual abuse, and to point them in the direction of actions to take and places to seek support if they are worried someone is or could be harmed.
8. To fund resources to deter and educate adults who have committed risky/illegal behaviours online; to properly evaluate these; and to research how best to target them, including careful messaging for vulnerable users.

9. To fund resources to deter and educate young people who have committed risky/illegal behaviours online; to properly evaluate these; and to research how best to target them, including careful messaging for vulnerable users.
10. Through an independent regulator, to legally compel online platforms to introduce, monitor and report on safeguarding measures, with effective punishment and enforcement, in a way that is future-proofed and appropriately considers private and encrypted spaces.

Our response

Preventing harm

The white paper is bold, ambitious and has a lot of merit, but it has a narrow idea of the issue of online harm. The problem has an impact on individuals and the wider public and so needs to be understood and addressed by looking at different parts of the whole population. By considering online harm as a public health issue, methods to prevent online harms can be aimed at:

- Primary prevention: intervening with all groups before harm occurs;
- Secondary prevention: reducing the risk of abuse in at-risk groups (i.e. preventing people from offending for the first time; preventing 'at risk' children from being abused)
- Tertiary prevention: preventing further offences after harm has occurred, by intervening with known offenders and victims.

We consider there to be four distinct sets of prevention targets:

- Abusers and potential abusers;
- Children and young people;
- Families and communities;
- Situations in which sexual abuse can occur.

It is positive to see that online child sexual abuse is the first issue noted in the white paper as a concern. However, it doesn't do justice to the significance of the emotional harm – research repeatedly shows that victims tell of the sense of being exploited continuously throughout their life. It also fails to reflect the significant physical harm victims can sustain due to abuse – disease, injury, pregnancy, infertility and even death.

Lots can be done to prevent child sexual abuse, but current approaches are often inadequate in scope, targeting and evaluation. They are also often dominated by interventions used only after offending or abuse has begun. We believe that preventing child sexual abuse is always preferable to responding to it.

The Lucy Faithful Foundation works to prevent child sexual abuse at all three levels of the prevention model.

- Our primary prevention approaches include our [Stop It Now helpline](#) (available to anyone with concerns about child sexual abuse); our [Parents Protect website](#) and public seminars; our indecent images of children (IIOC) deterrence campaign.
- Our secondary prevention approaches include our helpline (available to people concerned about their own thoughts, feelings or behaviour); our IIOC deterrence campaign; our [self-help website](#) for people concerned about their own thoughts; our training for professionals.

- Our tertiary prevention approaches include our helpline (available to people who have committed a crime, whether or not they've been arrested); our psychoeducational programmes and [self-help website](#) for people who have carried out IIOC offences as well as their families; our project working with young people who have exhibited harmful sexual behaviour online; our training, clinical assessments and interventions.

Prevention efforts across these areas vary in public acceptability and perception, due in part to views on the type of people who commit offences. There may be a stereotypical view in society of someone who commits sexual offences, but this fails to take into account the scale of the problem. The latest estimates¹ suggest around 80,000 people are regularly viewing IIOC online in the UK and people convicted come from all walks of life. This means that it is likely that the majority of people know someone who is committing offences or at risk of doing so. This is a key message that has failed to reach the public and underlies the success or otherwise of prevention activities.

The conceptualisation of harm being that 'bad people do bad things online' is incorrect – there is often a slide towards harmful behaviour that takes place. People aren't born to commit sexual offences but move towards this behaviour, sometimes through progressive violation of boundaries. Our research with people involved in online solicitation ('grooming') has shown that some men begin by asking adult women online to do sexual things, and then over time find girls are more likely to do the things they want, so they gravitate towards children because of this.

For proper prevention of sexual harm, an understanding of risky and offending behaviour needs to underpin what technology companies are doing regarding how their platforms are set up and how they try to prevent harm – both informing and learning from it.

Primary prevention

Children and young people are typically seen only as victims of harm online, but this is not always the case. Around one third of sexual abuse against children and young people is carried out by their peers², and it is clear that social media and digital platforms can enable young people to display harmful sexual behaviour³. Companies should have a duty to help their young users make good decisions and understand what is and isn't okay when using their platforms.

The white paper touches a little on primary prevention, for example what children are taught about online safety. Only small mention is made to sharing of self-generated nude images ('sexting') amongst young people, but it doesn't discuss the full scale of technology-assisted harmful sexual behaviours, from consensual sharing of sexual images and sexual conversations between peers, to behaviour involving unwanted sexualisation, sexual bullying, non-consensual sharing of intimate images and online behaviour and demands involving exploitation, coercion and threats.

We have carried out research⁴ to understand how young people, their parents and the professionals working with them view the online world. When asked what worried them most about sexual behaviour online, young people identified examples such as lack of sexual education, behaving in a way you wouldn't in real life, predators, lack of boundaries and regulation and their digital footprint.

¹ <https://www.gov.uk/government/speeches/keeping-our-children-safe>

² Hackett, NSPCC 2016 and The Office of the Children's Commissioner, 2015

³ Project DeSHAME, Young People's experiences of online Sexual Harassment, 2017

⁴Due to be published late 2019

On a scale of 1-10, parents on average rated their confidence as a 3 in knowing where to go if their children came to them with concerns. Professionals similarly lacked confidence when it came to working with young people with worrying sexual behaviour or who had got into trouble online. This clearly shows a need for better education for young people and the people who aim to keep them safe.

New technologies are emerging all the time with large differences in uptake between age groups⁵. The platforms that children use may be completely unknown to their parents, so information on widely applicable safe online behaviour is especially useful in the same way that parents might teach about generally appropriate behaviour in the real world. Parents also need up-to-date information from a reputable source that is easy to understand, regarding online risks at different ages, and strategies including technology that can assist in managing those risks. There is an overwhelming amount of, occasionally conflicting, advice on children's online safety with all internet service providers wanting to provide it to promote their brand. A single source of agreed advice with shared branding should be provided, so the confusion of where to look for advice is diminished.

Education and support for parents should extend to recognising the benefits of the online world to their children, supporting a balance between protection and helping children grow up. Researching schoolwork and staying connected with friends are hugely important parts of young people's lives and can be made much easier with online tools. An over-zealous protective approach might be attractive to some parents, but more important is helping them understand how best to show their children how to safely navigate the online world. It is difficult to strike the balance between leaving space for a child to mature and learn, and monitoring and controlling. This will also be different for different children and different ages.

Aside from parents and carers, schools are well-placed to teach children how to stay safe online, but also how this relates to physical and sexual health education more broadly. Teachers have an increasing list of demands on their time and so must be properly funded by the government and given adequate curriculum time to teach online safety.

Recommendation: to provide high quality education to children on how to stay safe online, that is properly funded and has sufficient time dedicated.

Recommendation: to provide a single, trusted source high quality resources to parents, carers and professionals.

Secondary prevention

There is little said in the white paper about secondary prevention, beyond taking a risk-based approach to online platforms. Secondary prevention helps to find some ways through the difficult issue of what constitutes online harm. There are clearly well-defined lines about what is illegal online, but many people will gravitate to legal grey areas such as images of teenagers thought to be aged 18 and over, naturist promotional material or accessing images of young athletes or child model for sexual purposes. Secondary prevention allows organisations to go to those grey areas and

⁵ <https://www.pewinternet.org/2018/03/01/social-media-use-in-2018/>

have some non-judgemental conversations with people about harm reduction, context, consequences, self-regulation.

Self-help for people at risk of committing offences online is another vital area of child protection. This won't work for everyone but can move people away from carrying out worse behaviour, thereby protecting children. This is the basis for our indecent images of children (IIOC) deterrence campaign and our helpline, websites and in-person programmes that it directs to. The purpose of the campaign is to clearly state that viewing IIOC online is illegal, has serious consequences for the viewer and the children in the images, and that there is help available to change behaviour – in the form of our resources. Clearly stating the law around certain points, including that the age of consent for sexual images is 18 rather than 16, is important to prevent offending in people who are unsure, as much as it is important to target people who know they have or might behave illegally.

Our public campaign works at the primary, secondary and tertiary prevention levels. Since the campaign launched, more than 5,000 people have called the Stop It Now! helpline regarding their own IIOC behaviour and more than 2,500 people have called regarding someone else's behaviour. Independent evaluation of the helpline shows that, as a result of the advice, people take steps to control their behaviour, including stopping all internet or pornography use, installing controls and filters on devices and informing partners or family members. Our Get Help website for IIOC viewers, their families and the professionals working with them had over 40,900 users in 2018 compared to around 23,000 in 2016.

The huge, and increasing, uptake of our resources shows that there is an audience that will engage with secondary prevention. The Stop It Now! helpline, campaign and resources have received government funding but more can be done in this area to research and evaluate which deterrence and help messages are effective with different at-risk groups, including for vulnerable users, and how best to reach these groups. This includes young people who, with the growth in technology and its availability, are at risk of both being harmed and harming online. While anyone can be subject to harm online and all children are vulnerable to sexual abuse, secondary prevention encourages a focus on particularly vulnerable users such as children with learning disabilities.

Funding should go further than the creation of resources themselves, so that it is possible to better target people who need help through advanced technology such as finding out who is more or less receptive to deterrence and disruption, thereby making online environments safer for children. Recommendations 6-8 from the 2019 Justice 'Prosecuting Sexual Offences' report⁶ to make online users aware when their behaviour is becoming more risky, promoting services available to people concerned about their own thoughts, and evaluation of these services, would make a valuable contribution to secondary prevention. These should be supported and trialled for other at-risk groups.

This model could be adopted for other areas of harm prevention, for example as Facebook is doing around people posting self-harm images. If we think about self-help and psychoeducation for those at risk of causing harm or at early stages, we could consider the application of bystander theories – what should a person do if they know someone is doing harmful things online? Campaigns based on bystander interventions have been carried out in relation to gendered violence in South Africa and some other jurisdictions, and could be used in the UK. Our IIOC campaign contains these messages but 'bystanders' aren't the primary target group – there is room for rigorous research and evaluation into this area.

⁶ <https://justice.org.uk/new-justice-working-party-report-prosecuting-sexual-offences/>

Platforms themselves can also be given particular attention based on risk and the interventions needed will vary depending on what they offer and how they function. Messaging apps or social networking sites might be grouped by some criteria, but the harms and risks they pose can be very different. Private messaging services and livestreaming sites are especially open to abuse and recent reports⁷ have suggested that algorithms, such as YouTube's, designed to keep users engaged and on a particular platform can lead to the viewer being shown increasingly extreme material.

The dark web is another important area for adequate prevention of online harm, both secondary and tertiary. The white paper reasonably states that issues related to the dark web are addressed in the serious and organised crime strategy, but there needs to be consideration for how the plans for the open web and dark web will coordinate. Many people at risk of offending will be active in both spaces and lots could be learnt, both academically and regarding crime prevention, by observing a person's activities over both.

Recommendation: to fund resources to deter and educate people who are at risk of committing risky/illegal behaviours online; to properly evaluate these; and to research how best to target them, including careful messaging for vulnerable users.

Recommendation: to fund research into, and application of, messages and interventions that target 'bystanders'.

Recommendation: to consider higher-risk spaces and situations that need special attention, such as platforms that host younger users or encourage particular behaviours.

Recommendation: to educate the public as to where real risks lie in terms of child sexual abuse, and to point them in the direction of actions to take and places to seek support if they are worried someone is or could be harmed.

Recommendation: to coordinate activities in the open and dark web to better understand and prevent risky/illegal behaviours.

Tertiary prevention

The white paper's discussion on reporting of concerns to tech companies and asking them to respond falls under tertiary prevention. But more can be done to direct people who have offended on platforms and elsewhere to sources of help to change their behaviour – research suggests that sex offenders have some of the lowest rates of reoffending across all groups showing that change is possible. Part of our discussion around secondary prevention also applies here – our national IIOC deterrence campaign and Scottish grooming deterrence campaign aim to move people away from their offending behaviour and towards sources of effective help.

Our Stop It Now! helpline works confidentially and anonymously with people who have already offended whether they are known to the police or not, and has been independently evaluated as providing an important contribution to child safety. Our Inform Plus and other interventions work face-to-face with people following arrest, and our self-help websites help people understand the triggers for their illegal online behaviour and how to change.

⁷ <https://www.nytimes.com/2019/06/03/world/americas/youtube-pedophiles.html>

Our services also include support for the adult family members of offenders. This group is not traditionally seen as harmed by abusive actions, but are in need of direct help themselves and can also contribute to the desistance of an offender by being given the tools to understand and support behaviour change.

Our project focused on young people aims to help children and adolescents understand their previous harmful sexual behaviour that has taken place online or been enabled by technology. An increase in the availability of technology means an increase in the possibility of committing or being the victim of online harm, with young people especially vulnerable as they attempt to navigate the offline and online worlds for the first time during a distinct period of cognitive, social and sexual development. The needs of adults and young people in tertiary prevention will have some crossover, but delivery and nuances will be different for each.

Our interventions show that some people will engage with rehabilitation programmes after they have offended. More research needs to be done into which are most effective and for whom. These then need to be provided as widely as possible.

Recommendation: to fund resources to deter and educate adults who have committed risky/illegal behaviours online; to properly evaluate these; and to research how best to target them, including careful messaging for vulnerable users.

Recommendation: to fund resources to deter and educate young people who have committed risky/illegal behaviours online; to properly evaluate these; and to research how best to target them, including careful messaging for vulnerable users.

Regulation

We agree with the need for greater regulation of online platforms. The white paper suggests that a regulator will have genuine powers including a sanction scheme. This is vital to raise the priority of these issues for the companies involved and improve the chance of them proactively designing technology to be more protective of users, especially children. The only drivers for companies to act responsibly are PR and profit, a situation that has led to widespread abuse. Companies must be compelled to act in the interests of their users, to be transparent, and to be held accountable when things go wrong.

It is positive to see reflections on technology design needing to be more considerate about the impact i.e. designs keeping users online longer for the benefit for the companies, rather than considering how to support user wellbeing. Technology companies often have huge profits and have significantly more scope for research and development work specifically into prevention of child sexual abuse online – from pre-screening uploaded images to make sure they don't depict child sexual abuse, to being able to spot patterns of risky or illegal behaviour such as grooming.

One of the challenges laid out in the white paper relates to the definition and regulation of public and private spaces. Online harm is a human behaviour that needs people to address and challenge it. The limitations of the regulator and balance of responsibility between young people, parents/carers and platforms need to be acknowledged. Harm prevention needs to focus on what might happen in private or encrypted spaces, for example Whatsapp and Kik social networking sites. Young people and their parents need to know that some platforms might be safer in principle, but if harm occurs in

a private online space then it might be difficult for the platform to be aware of it as things stand. The duty of care and legal responsibility of online platforms towards safeguarding must extend to these private spaces. Voluntary action, self-regulation and self-reporting have so far failed to protect children – the same approach cannot continue.

The detail regarding how the regulator will run and be linked to law enforcement is missing. The aims of the white paper to protect the public through strong regulation must not be diluted during the consultation process and must be future-proofed as far as possible. Predicting exact technological progress isn't sensible, but the kinds of issues the regulator may face in the future and the space in which it can act should be fairly expansive.

We also support the 2019 JUSTICE 'Prosecuting Sexual Offences' report recommendation that "a quality mark, similar to a 'Kitemark' should be developed for safe online spaces," which could be managed by the new regulator. The regulator will need to be properly resourced for what will be an enormous task. Given that law enforcement cannot keep up the demands of online offending, there are clear questions about how the regulator will cope. For this reason and to avoid being prejudged by the record of an existing body, we recommend that the regulator be a new, independent body. Initially it may be funded by technology companies themselves, and so care needs to be taken to avoid being unduly influenced – transparency in decision-making will be key. These issues suggest that the regulator should be accountable to Parliament.

Recommendation: through an independent regulator, to legally compel online platforms to introduce, monitor and report on safeguarding measures, with effective punishment and enforcement, in a way that is future-proofed and appropriately considers private and encrypted spaces.