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**Supporting Professionals to
Prevent Sexual Abuse**

NOTA is a charity and professional association that supports those working in the field of sexual abuse prevention. Operating throughout the UK and Republic of Ireland, NOTA comprises approximately 1200 professional members who are engaged in work to prevent and address sexual abuse and sexual offending. It is the largest organisation in the UK supporting practitioners working with adults, adolescents and children who display sexually abusive and sexually offending behaviour.

The safeguarding and protection of children and vulnerable adults from abuse and exploitation is fundamental to all aspects of the work of our organisation and accordingly we welcome to Government White Paper on Online Harm. Our focus in our response is on the prevention of sexual abuse of children online, either through the manufacturing and viewing on child sexual abuse material (CSAM) or through online solicitation. This is in line with the expertise of our membership in working directly with adults and adolescents who have been convicted of sexual offences or who display harmful sexual behaviour, working with survivors of child sexual abuse online and through knowledge gained working directly with children and parents in the prevention field.

We note the figures within the report relating to growing scale of the problem of child sexual abuse material. The viewing and distribution of such material fuels a market in the sexual exploitation of children internationally. NOTA's views is that this appalling state of affairs needs to be framed as a preventable public health issue which has to be tackled by a range of different interventions. This is also not a static problem but one that is highly fluid in nature – what may be effective today may not be effective tomorrow. A recent international survey of law enforcement agencies across 30 countries found technological developments, such as self-produced material, cryptocurrencies, and image manipulation, limit law enforcement capacity to prevent, detect, and prosecute online child sexual offending behaviour (NetClean, 2018).

The report focuses on the role of regulation of technology companies in the prevention of online harm. We agree that there such companies continue to fail to address issues in relation to online sexual abuse and exploitation of children. Online platforms should look to design-out an offender's capacity to share indecent images and videos, to prevent such online offences from happening. NOTA therefore welcomes the role of new Regulator and regulatory framework that is proposed. This role will need to have the right level of resources and the right combination of powers. In particular the regular must have the power to require the production of information about any given company's operations. The information thus obtained must form the core of the evidence that will be used to draw up the detailed regulations and codes that follow. The regulator would need to have access to both volume and nature of complaints and redress processes used within organisations. Companies will generally try to withhold such information on the ground that it compromises commercial confidentiality. NOTA strongly supports the use of super complaints so that the regulator has access to individual complaints that have not been resolved by organisations, as well as the right to penalise companies that refuse to share relevant data with the regulator or show poor standards in regulation of complaints.

Bearing in mind that many complaints will be in relation to children and young people – both as victims but also as individual who have caused online harm - the regulator will need considerable

support in relation to safeguarding issues and this should be part of the charter that establishes the new role. We would argue that part of the role of the regulator should be the auditing of technology companies in relation to their safeguarding responsibilities online, their compliance in working with law enforcement and safeguarding organisations openly and effectively and the extent to which safeguarding of children is at the heart of both decision making and future technology design and innovation.

NOTA would like to emphasise two interrelated limitations of the paper. First, the paper rightfully focusses on the removal of harmful material once it has gone online; this is a critical issue. From a public health perspective this is tertiary prevention; online harm has already taken place. The paper touches on primary prevention by discussing online safety initiatives. These need to be more widely publicised to parents and children, better researched and evaluated, more consistently applied across the UK, involve young people better in design and delivery and more robustly funded by the technology sector. We also believe that the regulator should have a role in engagement with primary prevention so that learning from tertiary prevention shapes primary prevention.

The difficulty is the paper does not engage with secondary prevention, in other words how we respond to signs and indicators of harmful behaviour emerging online. This needs to move beyond debates about blocking and closing accounts and instead include self-help resources, targeting of education, machine learning so that those who repeatedly post concerning material receive messaging and 'filter bubble' contexts that challenge the behaviour and attitudes that underpin them, and use of splash pages and anonymous helplines and similar resources.

It may be that there is little in the online harm paper about secondary prevention as there is a limited understanding amongst the general public about why sexual abuse and exploitation online occurs in the first place. This is an area that where NOTA and its members have particular knowledge and expertise. Our view is that an understanding of the different pathways and trajectories into sexually abusive behaviour online, as well as some of the situational drivers related to abusive behaviour, need to underpin effective prevention and disruption of online harmful behaviour. As one recent study found:

“There are cases, from a forensic examination point of view, where you can see a progression and a shift in interest and you can see where that interest sort of establishes and I think if that’s caught early enough, and certainly with younger offenders, I think it would be our view that we would generally favour a therapeutic response, especially with young offenders, than a punitive one, simply because there is an opportunity to hopefully alter the course of their movement” (Tyrell, 2016, p.15. cited Merdian et al. 2019).

Some of this must involve a more mature debate in society about the capacity some people have to be sexually interested in children. This needs to sit alongside an understanding that individuals who have these feelings can be taught better emotional and sexual regulation skills so they can effectively manage such thoughts and feelings without harm to children. Beier et al. (2009) suggest that detected and convicted sexual offenders are only “the tip of the iceberg” and that there exists a considerable number of undetected adults with a sexual interest in children outside of law enforcement’s control, with official offending rates underestimating the true rates of offending behaviour (Beier et al., 2015). Estimates of the number of men with a sexual interest in children vary between 0.1-5% of the population (Seto, 2009). Beyond this, algorithms online that encourage users of online pornography to look at increasingly extreme material and the desensitisation of regular users of online legal pornography which can lead to a seeking out of more illicit and transgressive

material suggest that online environments themselves may have a role to play in shaping sexual thoughts, feelings and behaviours. We remain concerned that young people, at a critical period in relation to their understanding of sex and their sexual development, are particularly vulnerable to these processes.

We welcome the Government's willingness to adopt a more strategic approach to online harm. In line with a recent publication by the International Working Group for the Prevention of Online Sex Offending (Brennan et al. 2019) we would suggest that current weaknesses in our system that need addressed include:

- Making ISPs more responsible for such content via publishing the details of the platforms/companies where CSAM offending is occurring;
- Enabling people with a sexual interest in children not to act on their sexual urges via support and education (extending this criminal issue into a health and social issue that is managed using a whole systems approach);
- Addressing issues with technology companies around algorithms online that may potentially drive some individuals towards more taboo breaking and transgressive materials;
- Establishing clear international standards and guidelines for better management of youth-involved sexual images;
- A shift towards broadening prevention approaches and a public understanding of CSAM offending through a wider, public information campaign, similar to that of Project Protect Dunkelfeld (PPD) operating in Germany;
- professionals engaged in CSAM research, treatment, management and prevention should also work more closely with the providers of online platforms and services to help design these situational barriers for the prevention of CSAM offending behaviour online;
- Engagement with the adult pornography industry in a targeted and nuanced way. A particularly effective tactic may be to track cookies and hone-in on potential offenders (e.g. by sending 'pop up' warning messages to those who spend most of their time in the 'teen' category to act as a deterrent);
- Funding for more research on: 1) The aetiology, assessment and treatment of CSAM-exclusive offenders, including longitudinal research; 2) Potential offenders' strengths and desistance-enhancing factors; 3) Those who sexually solicit children online, as most research currently focuses on solicitation offenders caught during police investigations ('stings'); 4) Possible changes in recidivism rates for CSAM offending populations in response to recent law enforcement experiences and the severity of CSAM.
- Develop innovative police intervention methods with online child sex offenders, such as warning letters or informal home visits, either for prevention or prosecution purposes.
- Whilst there is evidence of good practice in the management and prevention of online sexual offending thus far, there still remains a need to promote efforts to share and block CSAM (e.g. sharing known and first-generation image information with online service providers such as ISPs to allow for pre-screening, filtering and blocking).

NOTA as a UK wide organisation would be happy to engage with any further discussions following on from the consultation where our expertise and that of our membership may be of use.

On behalf of NOTA:

Professor Simon Hackett, Chair of NOTA.

Stuart Allardyce, Chair of NOTA Policy and Practice Committee.

References

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