

Evaluation and impact assessment of the Child Sexual Abuse Directive

Fields marked with * are mandatory.

Introduction

The 2020 EU Strategy on a more effective fight against child sexual abuse includes evaluation of the EU Directive on combating child sexual abuse, sexual exploitation and child pornography (2011/93), (from here onwards 'the Directive'), and identification of best practices and any remaining legislative gaps. If necessary, new priority actions will be proposed to ensure that this legislation continues to reach the goals that it sets out to achieve.

The purpose of the present open public consultation is to inform the evaluation and possible revision of the EU Child Sexual Abuse Directive, and it is part of the data collection activities following the Inception Impact Assessment published in September – October 2021.

Terminology

CSA - Child Sexual Abuse

CSA content - Text-based exchanges, photos, videos, and other material illegal under the EU Directive on combating child sexual abuse. CSA content can include any related content promoting or facilitating CSA

CSAM - Child Sexual Abuse Material

Grooming - Offenders building trust and a relationship with a child in an effort to gain access to the minor for sexual exploitation or abuse. Also known as solicitation.

Hotline - Child sexual abuse hotlines/helplines deal with questions about or reports of child sexual abuse.

They can report content to law enforcement, take action for CSAM to be removed from the internet.

Child sex tourism - The sexual exploitation of children by person/s who travel from their usual environment to a destination abroad to have sexual contact with children

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About you

* Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch

- English
- Estonian
- Finnish
- French
- German
- Greek
- Hungarian
- Irish
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

If relevant, please specify whether you are giving your contribution as:

- Victim of child sexual abuse and sexual exploitation

- Relative or friend of child sexual abuse and sexual exploitation
- Non-governmental support services for victims of child sexual abuse and sexual exploitation
- Governmental support services for victims of child sexual abuse and sexual exploitation

* First name

Michael

* Surname

TUNKS

* Email (this won't be published)

mike@iwf.org.uk

* Organisation name

255 character(s) maximum

Internet Watch Foundation (IWF)

* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

255 character(s) maximum

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

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* Country of origin

Please add your country of origin, or that of your organisation.

- Afghanistan
- Djibouti
- Libya
- Saint Martin
- Åland Islands
- Dominica
- Liechtenstein
- Saint Pierre and Miquelon

- Albania
- Algeria
- American Samoa
- Andorra
- Angola
- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Dominican Republic
- Ecuador
- Egypt
- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Lithuania
- Luxembourg
- Macau
- Madagascar
- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar/Burma
- Namibia
- Saint Vincent and the Grenadines
- Samoa
- San Marino
- São Tomé and Príncipe
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden

- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States

- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba
- Curaçao
- Cyprus
- Czechia
- Democratic Republic of the Congo
- Denmark
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- Lebanon
- Lesotho
- Liberia
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Saint Helena
Ascension and
Tristan da Cunha
- Saint Kitts and
Nevis
- Saint Lucia
- United States
Minor Outlying
Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and
Futuna
- Western Sahara
- Yemen
- Zambia
- Zimbabwe

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The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

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Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the [personal data protection provisions](#)

Part I – the evaluation of Directive 2011/93/EU on combating the sexual abuse and exploitation of children and child pornography.

1. Effectiveness – was the Directive successful in achieving objectives?

a) Effective crime investigation and prosecution

* 1. In your view, is an EU-wide cooperation necessary to effectively combat child sexual abuse?

- Yes
- No
- I do not know

* 2. In your view, has the Directive contributed to successful criminal proceedings?

- Not at all
- Small extent
- Moderate extent
- High extent
- Very high extent
- I do not know

*

3. In your view, do the **penalties** foreseen by the Directive have a proportionate and dissuasive effect?

- Not at all
- Small extent
- Moderate extent
- High extent
- Very high extent
- I do not know

Please provide further comments including references to specific sanctions.

500 character(s) maximum

The Directive attempts to strike a delicate balance between ensuring that child victims are not criminalised in these cases as well as ensuring proportionate penalties for those who seek to exploit children. Over the past decade we have seen a worrying growth in online child sexual abuse, which suggests both the prevalence and availability of this content online is simply too high, potentially the measures to dissuade people from seeking this content have not been enough or a mixture of the two.

4. In your view, have the following measures of the Directive contributed to facilitating the **reporting** of instances of child sexual abuse? (If, in your opinion, certain measures of the Directive were not implemented correctly in your country, please choose the 'not fully implemented' column).

	Not at all	Small extent	Moderate extent	High extent	Very high extent	Not fully implemented	I do not know
* Extension of statute of limitation after the victim has reached majority	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Ensuring that confidentiality rules do not prevent reporting of child sexual abuse by professionals who work with children.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Raising awareness and training professionals regularly in contact with children to recognise signs of child sexual abuse and take action	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Setting up of child-friendly reporting mechanisms e.g. telephone and internet hotlines	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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Please provide further comments linked to either the measures listed or any other measures not included above which may have facilitated the reporting of instances of child sexual abuse

500 character(s) maximum

Disclosures from victims of child sexual abuse are always going to be an essential part of detecting the crime and bringing offenders to justice. Victims should have access to adequate support, whether that is seeking their images to be removed online or disclosing abuse in a confidential manner to a person with appropriate training. All of these rights for victims should be further extended. We also need a broader conversation about the nature and scale of sexual abuse online in communities.

5. In your view, have the following measures of the Directive contributed to improving the **investigation and prosecution** of offenders? (If, in your opinion, certain measures of the Directive were not implemented correctly in your country, please choose the 'not fully implemented' column).

	Not at all	Small extent	Moderate extent	High extent	Very high extent	Not fully implemented	I do not know
* Investigations and prosecution of the offences can continue even if the victim's statement was withdrawn	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Extraterritorial jurisdiction for offenders: EU nationals who commit offences abroad, can be prosecuted in their country	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Procedural obstacles to international cooperation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Effective investigative tools available to the police, such as those used against organised and serious crime, and special units set up to identify victims of child sexual abuse online	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide further comments linked to either the measures listed above or any other measures not included which may have facilitated the reporting of instances of child sexual abuse

500 character(s) maximum

These are questions which are better answered by our law enforcement partners as to the effectiveness of these measures. We are aware that there have been examples in the UK of all of these measures being used by the National Crime Agency's Child Exploitation Online Protection Team to bring people to justice who have committed crimes against children. As to how widely they have been adopted in EU Member States, we are not best placed to respond.

b) Support and assistance to victims

* 1. In your view, has the Directive contributed to ensuring that victims of child sexual exploitation and abuse have access to adequate **assistance, support, and protection measures**?

- Not at all
- Small extent
- Moderate extent
- High extent
- Very high extent
- I do not know

* 2. In your view, has the Directive contributed to ensuring that victims are not punished for their involvement in criminal activities that they may have been compelled to take part in, or were involved in unknowingly? (e.g. in cases of self-producing material which is then circulated online, whether the production is voluntary or a result of grooming or sextortion).

- Not at all
- Small extent
- Moderate extent
- High extent
- Very high extent
- I do not know

3. In your view, have the measures included in the Directive and listed below contributed to improving the support victims receive?

	Not at all	Small extent	Moderate extent	High extent	Very high extent	Not fully implemented	I do not know
* Prevention of additional trauma caused by involvement in criminal investigations and proceedings	<input type="radio"/>	<input checked="" type="radio"/>					
* Assistance and support as soon as there are reasonable grounds to suspect offence	<input type="radio"/>	<input checked="" type="radio"/>					
* Special protection for children reporting abuse within the family	<input type="radio"/>	<input checked="" type="radio"/>					
* Assistance and support not conditional on cooperation with criminal proceedings	<input type="radio"/>	<input checked="" type="radio"/>					
* Protection of victim's privacy, identity and image throughout criminal proceedings	<input type="radio"/>	<input checked="" type="radio"/>					

Comments

500 character(s) maximum

We are extremely concerned at the rise in self-generated indecent images of children. Since the start of the pandemic, we have seen a 374% rise in this content in just two years, mainly affecting girls in the 11-13 age range. We would like to see this acknowledged as its own category of abuse within the directive. We would also like to see Member States adopt initiatives such as Report/Remove to give children somewhere to report images they may have generated of themselves so they can be removed

* 4. Have you ever tried to have CSA content featuring you or someone close to you removed from the web?

- Yes
 No

Please elaborate your answer further, providing examples of organisations you contacted in this process.

500 character(s) maximum

Please elaborate your answer further, providing information on the different aspects of assistance received

500 character(s) maximum

c) Prevention of child sexual abuse and exploitation

1. In your view, have the measures included in the Directive and listed below reduced the risk of children becoming victims of sexual abuse?

	Not at all	Small extent	Moderate extent	High extent	Very high extent	Not fully implemented	I do not know
* Education programmes aimed at children	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Education programmes and training for parents/carers	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Education programmes for teachers and other professionals working with children	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* General awareness raising campaigns aimed at the general public	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Prevention programmes to stop offenders from committing further offences against children	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Prevention programmes for people who have not committed a crime but fear they may offend against children	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Right of employers for professional and voluntary activities involving direct and regular contact with children to request information about prior convictions and disqualifications	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Background checks by employers	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Removal /blocking of webpages containing or disseminating CSAM	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Prevention of advertising opportunities to sexually abuse children, and organising travel for this purpose	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please specify any other measures or add any comments

500 character(s) maximum

IWF and 3 of our industry partners successfully blocked 8.8 million attempts to access known child sexual abuse material in April 2020. We have also developed a chatbot deployed on an adult website that responds to people inputting known CSEA search terms, so we know these technical initiatives have impact and need to be more widely adopted. We ran an awareness campaign with parents and young girls about the dangers of CSE/A content, which proved that just 1 conversation can make a difference.

d) Effective monitoring systems of policy to fight child sexual abuse and exploitation

* 1. To your knowledge, are there harmonised national mechanisms to measure the extent of crimes related to child sexual abuse in your country, e.g. databases or statistics about cases?

- Yes
- No
- I do not know

Comments

500 character(s) maximum

2. Efficiency - costs and benefits of the EU intervention

* 1. In your view, were the effects of the Directive achieved at a reasonable cost?

- Yes
- No
- I do not know

2. In your view, has the implementation of the Directive caused unnecessary administrative burden?

- Yes
- No
- I do not know

Comments

500 character(s) maximum

3. Coherence - how well the legislation works: i) internally and ii) with other EU legislation and international instruments

1. Do you consider the Directive is coherent with other relevant EU legislation, for example with the following?

	Yes	No	I do not know
Victims' Rights Directive (2012/29/EU)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU Anti-Trafficking Directive (2011/36/EU)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Regulation on a temporary derogation from certain provisions of the ePrivacy Directive, regarding the use of technologies by providers of number-independent interpersonal communications services for the processing of personal and other data for the purpose of combating child sexual abuse. (2021/1232/EU)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

2. Do you consider the Directive coherent with international instruments and standards related to combating child sexual abuse and exploitation, for example with the following?

	Yes	No	I do not know
Council of Europe Convention on protection of children against sexual exploitation and sexual abuse	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
United Nations Convention on the Rights of the Child	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
United Nations Sustainable Development Goals	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

3. Which EU legislation and/or international instruments is the Directive not coherent with and why? Please add any other relevant comments.

500 character(s) maximum

4. Relevance – is the Directive up to date?

1. Do you think that the provisions of the Directive address the current needs of the society? Specifically do they address:

- * 1.1 Issues caused by the development of new technologies including use of peer-to-peer networks, end-to-end encryption and crypto-currency to facilitate this crime, artificial intelligence and use of deep-fakes?

- Not at all
- Small extent
- Moderate extent
- High extent
- Very high extent
- I do not know

* 1.2 The increasing online dimension of this crime including e.g. the online production and distribution of CSAM, live streaming of abuse, hosting of this material in bulletproof online spaces etc.

- Not at all
- Small extent
- Moderate extent
- High extent
- Very high extent
- I do not know

* 1.3 Equipping children with the right knowledge and skills needed to support healthy sexual development whilst staying safe online, including by identifying and reacting appropriately to risky situations e.g. sexting, grooming and self-generation of illicit images and videos.

- Not at all
- Small extent
- Moderate extent
- High extent
- Very high extent
- I do not know

Please comment on which needs are not being met in the context of combating CSA, and whether there are any new needs not covered by the provisions of the Directive

500 character(s) maximum

The European Commission has recently published new legislation to prevent and combat the spread of child sexual abuse online. The Directive must align with the EC's proposals in that area. For example, there is no definition of grooming within the current directive, it is unclear whether live streaming, "capping" and self-generated images are covered sufficiently by the directive. The EC should also look to the recent Lanzarote Committee's monitoring round for further alignment opportunities.

5. EU added value - did the Directive make a difference?

* 1. In your view, has the Directive made it easier for Member States to tackle child sexual abuse, exploitation and child sexual abuse material?

- Yes
- No
- I do not know

In your comments please explain how and/or why the Directive has added value

500 character(s) maximum

The Directive has the ability to set basic levels of expectations for Member States. It is unclear as to how effective this has been when infringement proceedings have been opened by the European Commission against 23 Member States. We are unsure what the proceedings relate to, so it is therefore difficult to ascertain whether or not the directive has assisted Member States.

2. In your view, has the Directive contributed to reducing the occurrence of CSA in relation to:

	Not at all	Small extent	Moderate extent	High extent	Very high extent	I do not know
* Prostitution of minors	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Sexual abuse and exploitation of minors in vulnerable situation (e.g. in care institutions, in faith institutions, children with a disability, children in migration , the LGBTQI+ community, children who belong to minority and/or marginalised groups...)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Child sex tourism	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Consumption of CSAM	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Sharing and distribution of CSAM online including in peer-to-peer networks, and anonymised access like Darknet networks (e.g. Tor)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Online sexual abuse and exploitation, e.g. forcing the child to participate in sexual activities or produce compromising images and videos of themselves	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Grooming for the purpose of sexual abuse and exploitation both offline and online	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

* Online hosting of CSAM and availability of CSAM in the open web	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Livestreaming/live distant child sexual abuse	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Prevalence of offending (both contact offences and otherwise)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Networking and forensic awareness by offenders	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other

500 character(s) maximum

Part II - revision of the Directive

1. Subsidiarity: Necessity and added value of EU action

* 1. In your view, does the aim of preventing and combatting child sexual abuse continue to require action at the EU level?

- Yes
- No
- I do not know

* 2. Do you think that there are crimes relating to sexual exploitation and abuse of children that the Directive does not explicitly refer to, which should be included in the Directive? If yes, please specify which ones in the comments section.

- Yes
- No
- I do not know

Comments

500 character(s) maximum

As mentioned in previous answers, there is no definition in the directive of grooming (sexual communication with a child), or preparatory offences such as arranging to meet a child with the intent of performing a sexual activity, possession of paedophile manuals, non-photographic imagery (NPI) depicting minors, or recognition of new phenomena such as self-generated child sexual abuse imagery.

2. Specific objectives:

a) Ensure criminalisation of all forms of CSA

1. Are there any specific current or future challenges that are not and should be covered by the provisions of the Directive? In particular in relation to:

* 1.1 The increasing online dimension of child sexual abuse and exploitation

- Yes
- No
- I do not know

* 1.2 Challenges caused by specific technological developments including deep fakes and AI-child sex robots, and the metaverse

- Yes
- No
- I do not know

* 1.3 Monetisation of child sexual abuse material and novel ways to carry out child sex tourism including live-streaming of abuse

- Yes
- No
- I do not know

* 1.4 Any other challenges not mentioned above (please specify).

- Yes
- No
- I do not know

Comments

500 character(s) maximum

The European Commission should ensure that any reform to the Directive is future proofed as much as possible. By updating offences in the Directive, the Commission must think about how new tools such as deep fakes and the metaverse will cause harm in the future. Moves to a more immersive online experience also increases the possibility of real world harms being caused to children, through their online experiences.

b) Ensure that national rules on investigation and prosecution allow for an effective fight against child sexual abuse

1. In your view, what could further facilitate the reporting of abuse?

500 character(s) maximum

We support measures in the European Commissions recent proposals for a new EU Centre and would encourage a proactive approach from companies in detecting new forms of sexual abuse online. National Co-ordinating authorities role in supporting victims to have their imagery removed, should further enhance and improve the response to victims alongside new technical tools such as report/remove to assist victims in having their imagery prevented from being spread online or swiftly removed.

* 2. Are you aware of any national laws that go beyond the provisions of the Directive, for example criminalising acts that are not included in the Directive? If yes, please specify in the comments section.

- Yes
- No
- I do not know

* 3. Do you agree/disagree that the Directive should be amended so that, Member States are required to nominate one national authority as coordinating authority that is responsible for the collection, monitoring and reporting of data concerning the implementation of the Directive and relevant policies?

- Yes
- No
- I do not know

Comments

500 character(s) maximum

In the UK, the 2015 Serious and Organised Crime Act creates the offence of possession of a paedophile manual. The UK's Coroner's and Justice Act makes possession of Non-Photographic Images (NPI) of Children illegal. On National Co-ordinating authorities, they should be required to closely co-operate with hotlines, align with DSA provisions, and also be adequately funded and resourced to carry out the range of responsibilities they have been charged with in the EC's newly proposed legislation.

4. Should the Directive include legal harmonization on:

	Agree	Disagree	Do not know
* Age of sexual consent	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Definition of effectiveness of prevention programmes	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Investigative tools and techniques allowed to combat child sexual abuse (e.g. investigations also on the DarkWeb/Darknet/ToR-based forums and platforms)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Start of the limitation period	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Self-generated material produced and exchanged by children who have reached the age of sexual consent with their peers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Civil damages awarded to victims	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

c) Improve assistance to victims and ensure an increased coordination among all the actors involved

1. What type of support should be provided to victims of child sexual abuse that may currently be missing? Please think in particular of what services and institutions should be involved.

500 character(s) maximum

* 2. Do you think that the gender dimension, in particular the protection of girls, should be more prominently articulated in the Directive? Please specify your answer below.

- Yes
- No
- I do not know

Comments

500 character(s) maximum

The IWF has noticed that girls are featuring more prominently in our statistics. Other studies have found are more likely to be disproportionately affected by these issues. 10 years ago they appeared in 65% of reports we removed from the internet, today it is 97%. We should be careful, however, not to diminish the impact of these crimes on boys. Interestingly, through report/remove we have seen an increase in boys self reporting, we must carry out more research into better understanding trends.

* 3. Do you think that the situation of vulnerable groups of children including: children from disadvantaged background and at risk of social exclusion, Roma, children with disabilities, LGBTIQ+ should be more prominently articulated in the Directive?

- Yes
- No
- I do not know

Comments

500 character(s) maximum

We know that children from disadvantaged backgrounds are more likely to be victims of child sexual abuse. We must ensure through the reform of the Directive that there are better protections in place for vulnerable users.

* 4. Are there any other issues that are not currently addressed, which should be addressed by the Directive?

- Yes
- No
- I do not know

Comments

500 character(s) maximum

Concluding remarks

If you wish to add further information or examples such as best practices, lessons learned, relevant initiatives, cases, statistics — within the scope of this consultation — please feel free to do so here (maximum 300 characters).

2000 character(s) maximum

Please feel free to upload a concise document, such as a position paper. The maximum file size is 1MB. Please note that the uploaded document will be published alongside your response to the questionnaire, which is the essential input to this public consultation. The document is optional and serves as additional background reading to better understand your position.

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

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