



Violence Against Women and Girls (VAWG) Call for Evidence

Organisation responding: The Internet Watch Foundation (IWF)

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1. About the Internet Watch Foundation (IWF)

- 1.1 The Internet Watch Foundation (IWF) is a charity that works in partnership with the tech industry, law enforcement and government to remove images and videos of child sexual abuse wherever they are hosted in the world.
- 1.2 We provide a secure and anonymous place for the public to report suspected incidents of this content and use the latest technology to proactively search the internet for these images and videos. The technical tools and services we provide help to keep technology companies platforms and services free from child sexual abuse.
- 1.3 The IWF is one third of the UK Safer Internet Centre (UKSIC), a partnership of three organisations working to make the internet a safer place. The Centre's main functions include:
 - Awareness Centre: to provide advice and support to children and young people, parents and carers, schools, and the children's workforce and to coordinate Safer Internet Day across UK.
 - Helpline: to provide support to professionals working with children and young people with online safety issues.
 - Hotline: an anonymous and safe place to report and remove criminal online content online child sexual abuse imagery and videos, wherever they are found in the world. The UKSIC has an awareness centre, a hotline, and helplines.
 - Runs the Revenge Porn Helpline- which is supported through direct funding from the Home Office.
- 1.4 The UKSIC currently provides the secretariat for the APPG for Social Media which is running an inquiry: "Selfie Generation: What's behind the rise in self-generated indecent images of children online?" and we are sure the Group when it reports, will have some relevant recommendations which could help to complement the Government's work on violence against women and girls.

2. Recommendations

- 2.1 **That the Government commissions further research into online violence against girls, specifically the root causes of this and how it intersects with other issues.**
- 2.2 **That the Government brings forward a strategy to tackle the impact pornography has on women and girls and ensures that children's exposure is limited by implementing age verification mechanisms in the forthcoming Online Safety Bill.**

- 2.3 That the Government does more at an earlier age to encourage young boys to have open conversations with trusted adults about the importance of healthy relationships.**
- 2.4 That the Government actively invests in reporting mechanisms such as Report Remove and the Revenge Porn helpline that give children (particularly young girls) and women somewhere to report images they may have created so that they can have them removed and further enhances confidence and trust in such mechanisms.**
- 2.5 That the Government joins up its approach on the online safety of women and girls by ensuring that the Violence Against Women and Girls strategy complements measures in the Online Safety Bill and the Tackling Child Sexual Abuse and Exploitation Strategy.**
- 2.6 That the Government continues to invest in the activities of the UK Safer Internet Centre and its hotlines and helplines which do so much to assist women and girls in removing large amounts of child sexual abuse content and revenge pornography every year.**

3. Introduction

- 3.1 We welcome this opportunity to contribute to this call for evidence, and the Government's ambition both to prevent violence against women and girls and plans to make the UK the safest place in the world to go online.
- 3.2 The IWF's remit is distinct and limited to tackling illegal content, specifically online child sexual abuse material (CSAM) hosted anywhere in the world and non-photographic images of child sexual abuse hosted in the UK. For this reason, we believe that we have a unique perspective to contribute to the VAWG Strategy, primarily the sexual exploitation and abuse of girls online.
- 3.3 We are delighted that this call for evidence will include a focus group area of "online harms and technology-enabled abuse" and we would be very happy to contribute further to the new Strategy beyond this written submission.
- 3.4 We would also like to take the opportunity to praise the Government for reopening this consultation considering recent events. It is sad that, as with the murders of April Jones and Tia Sharp in 2012, a tragedy has been the reason behind our renewed focus on these pressing issues as a society. We hope that this will change in the future and there will be no more national tragedies that make us regret not protecting women and girls more effectively from harm.
- 3.5 We would also like to praise the Government for the action it has already taken to improve the response to online harms against women and girls. We particularly welcome the recent changes to the law as part of the recent Domestic Abuse Bill, that make the threat to share intimate images a criminal offence. We know only too well through our partners in the UK Safer Internet Centre, SWGfL, that the sharing of intimate images disproportionately affects women. The helpline has helped 9,000 victims, 62% of which were Women.
- 3.6 The Home Office has also recently provided the IWF with funding to run a campaign to target 11–13-year-old girls and their parents and carers about self-generated indecent imagery, which we also know disproportionately affects young girls. Of the 68,000 webpages we removed in the last year which were confirmed as containing self-generated indecent images, 95% contained imagery of girls and 81% were of girls in the 11-13 age range.
- 3.7 However, despite these initiatives, we believe there are some systemic issues which the Government must tackle to ensure women and girls are better protected from online harms in the future. It is particularly important to consider the role of pornography and its impact on society, the need for

further improvements in educating children about healthy, respectful relationships and the importance of improving both reporting mechanisms and women and girl's confidence in these reporting tools.

4. Scale of Online Violence against Girls and the need for a priority response

- 4.1 In 2020, the National Crime Agency conducted an assessment that showed there are at least 300,000 people in the UK who pose a sexual threat to children¹ and, at the Independent Inquiry into Child Sexual Abuse (IICSA), evidence from law enforcement stated that there are at least 100,000 people² in the UK accessing indecent images at any one time.
- 4.2 At the IWF, we have seen clear evidence to confirm that many people in the UK are accessing CSAM, and that these images and videos are available on a widespread scale.
- 4.3 **In 2020 our analysts processed 299,000 reports of suspected CSAM (up 15% from 2019) and removed 153,350 of these webpages because they did contain images or videos of children being sexually abused (an increase of 16% from 2019.) Each report can contain between one and thousands of individual images and videos.**
- 4.4 In 93% of cases, the victims were female and in an additional 3% of cases the images showed victims of both sexes.
- 4.5 This means that our analysts removed millions of images and videos showing girls being abused in the last year. Tackling VAWG effectively requires a priority focus on online sexual abuse, especially around the transitional ages between primary and secondary education.
- 4.6 The impact on victims is significant and distressing, particularly as these images and videos may be recirculated for many years after they were originally created. In one example, Tara (not her real name) was repeatedly abused over several years. When she was rescued, US Law enforcement confirmed that they knew of over 70,000 occasions when images of her had been shared. In the US, victims can also ask to be notified when their 'files' (or imagery) are found as part of the police investigation. Tara and her mother have received over 7,500 of these notifications to date.
- 4.7 As part of the IWF's 2018 annual report³, our analysts traced the imagery of a little girl called Olivia (not her real name). Our analysts first saw Olivia around aged 3. She was photographed and filmed in a domestic setting, which sadly could have been her home and with someone she trusted. Our analysts have repeatedly seen imagery where she is being raped and sexually tortured. It is highly likely that the man responsible for conducting this abuse was also responsible for first sharing this imagery online. Police eventually rescued Olivia in 2013, when she was 8 years old. To give you an idea of the repeated victimisation of children such as Olivia, our analysts saw her imagery 347 times in just one three-month period. On average that is 5 times every working day.
- 4.8 This leaves the victims of these crimes constantly worried that someone may recognise them from the abuse images that have been shared and are circulating online. It makes their ability to recover from the experiences even more complex and has long lasting impacts on their mental and physical health.
- 4.9 At the beginning of the COVID-19 pandemic, the IWF and many law enforcement agencies globally warned that there could be increases in the online abuse of children due to most people spending increasing amounts of time online and children being isolated from support services in schools. Unfortunately, we have seen significant numbers of UK users trying to access CSAM during the lockdowns.

¹ <https://www.nationalcrimeagency.gov.uk/news/onlinesafetyathome>

² <https://www.iicsa.org.uk/document/internet-investigation-report-march-2020> Page 8.

³ <https://www.iwf.org.uk/report/2018-annual-report> page 11

- 4.10 **Data provided to the IWF by three companies serving the UK market which deploy the IWF’s URL list shows that in the UK alone, there were more than 8.8 million attempts to access known CSAM in just one month at the start of lockdown.**
- 4.11 One of the trends that we have noticed over the last few years is an increase in “self-generated” material, often where a child is coerced into producing and sharing a sexual image or video of themselves which is then captured and reshared by the offender.
- 4.12 **Out of all 2020 reports, 68,000 reports included “self-generated” child sexual abuse content – a 77% increase of the year before.**
- 4.13 This type of abuse predominantly affects very young girls, often in their bedrooms or other domestic settings – we found that in 95% of this type of content, the victim was female and in another 3% there were both male and female victims. In the majority of cases (81%), images or videos of self-generated child sexual abuse showed a child aged 11 to 13 years old. In a further 15% of cases, the image or video showed a child aged 10 or under.⁴
- 4.14 Our partners in the UK Safer Internet Centre, SWGfL, have also seen an explosion in reports related to revenge pornography. Their Revenge Porn helpline saw a 148% increase in cases between February 2021 and February 2020. In 2020, the helpline dealt with 3,152 reports (87% higher than 2019), removed over 99,000 images of Revenge Porn, and helped 3,152 victims. Some of those people reported feeling suicidal when describing the impact of their images being shared.

5. Further research required

- 5.1 Again, the majority of these reports (62.6% and 70.1% if sextortion cases are removed) are by women. It seems that women continue to be more vulnerable to online sexual violence from childhood into adulthood. We believe that there is a need for a national conversation to question and explore why this is the case.
- 5.2 One of the aims of the 2016-2020 VAWG Strategy was to “Protect people from online abuse and exploitation, and new kinds of offending driven by technological change” and, at the IWF, we have seen that this is more important than ever before and should be a priority part of the new VAWG strategy.
- 5.3 The IICSA Rapid Evidence Assessment: *Behaviour and Characteristics of Online-facilitated Child Sexual Abuse and Exploitation* found that those viewing CSAM are predominantly men from white or European backgrounds and are less likely to have a criminal background or prior offending than contact offenders.⁵
- 5.4 Particularly given then that a disproportionate number of young girls are victims of online sexual abuse and most offenders are male, we believe that tackling online abuse requires further research into how it intersects with other issues related to gender inequality and VAWG.
- 5.5 We know that there are other online harms that appear to have a gendered dimension too. For instance, evidence from the Mental Health Foundation suggests that girls are more likely to have body image concerns than boys⁶, and research from various studies has found that women MPs in the UK are much more likely to be subject to sexist online abuse than men⁷.

⁴ These statistics are from the IWF Annual Report 2020, showing the trends and data for 2020. This report will be published on our website from 21 April 2021.

⁵ <https://www.iicsa.org.uk/key-documents/3720/view/rapid-evidence-assessment-behaviour-characteristics-perpetrators-online-facilitated-child-sexual-abuse-exploitation.pdf> p 10

⁶ <https://www.mentalhealth.org.uk/publications/body-image-report/childhood>

⁷ <https://onlinelibrary.wiley.com/doi/pdf/10.1111/newe.12078>

- 5.6 There are likely to be societal reasons why young girls are so much more likely to be victims of grooming and sexual abuse online, and why men are most often the ones perpetrating this abuse. Whilst we at the IWF have access to key statistics that indicate certain trends, we would urge the Government to explore the underlying causes of online VAWG in order to be able to develop a holistic and effective response. For instance, understanding what the specific vulnerabilities are for young girls could help to shape educational programmes and reporting mechanisms.
- 5.7 In 2014 research showed that the estimated cost of child sexual abuse to the UK Economy was around £3 billion per year. The research report estimated that the cost to the economy because of lost labour productivity was £2.7 billion per annum, and health care resulting from emotional and health issues (such as depression or behavioural problems) could cost as much as £182 million.⁸ This research could be well worth revisiting with a particular focus on the impact of child sexual abuse on women and girls. This could be very helpful in securing further funding and interventions in support of women and girls.

6. The Role and Impact of Pornography on Women and Girls

- 6.1 Evidence given to the IICSA Internet Investigation from the NCA and from Chief Constable Simon Bailey showed that many offenders progress from looking at legal pornography to more extreme pornography to finally viewing CSAM.⁹
- 6.2 We believe that there is a need for further research into this, and for better investment into early preventative interventions for men. This might include education for men about what the law says and how to report CSAM if they see it, but more importantly for increased investment in services that help men confront the realities of their actions and have a safe space to bring forward their concerns about their actions.
- 6.3 As one example of this, using EVAC funding, we are currently developing a Chatbot¹⁰ along with the Lucy Faithfull Foundation that will engage with internet users if they show signs that they might be looking for CSAM. It will engage them in a supportive conversation and signpost them to help.
- 6.4 We would also recommend that the Government develops a strategy for regulating the adult industry, to enable organisations like the IWF to best develop mechanisms for working in partnership with these companies to remove CSAM from their platforms.
- 6.5 We would urge the Government to encourage age verification for adult platforms and to take other steps to ensure that children are not viewing violent pornography. We recognise the complexities of age verification, particularly with the widespread availability of VPNs and proxy browsers, however, this does not mean we shouldn't be striving to make the internet a better place particularly for children. We would recommend that the Government works with the newly appointed regulator, Ofcom, the IWF and tech industry through the Online Safety Bill to develop the right effective technical and legislative solutions to this challenge.
- 6.6 The APPG for Social Media will be producing a report based on their inquiry into the increasing amount of "self-generated" indecent images online. As highlighted above, this has a significant gendered aspect to it, so we would recommend that the Government considers the recommendations in the APPG report when it reports later this year.
- 6.7 We ask that the Government considers the nuances of image-sharing and abuse, for instance girls can experience abuse from peers or from older predators, and they may share an image knowingly or

⁸ <https://learning.nspcc.org.uk/research-resources/2017/economic-cost-child-maltreatment>

⁹ <https://www.iicsa.org.uk/key-documents/17805/view/internet-investigation-report-march-2020.pdf>

¹⁰ <https://www.iwf.org.uk/news/game-changing%E2%80%99-chatbot-to-target-people-trying-to-access-child-sexual-abuse-online>

under coercion. We believe it could be useful to explore some of these different scenarios and the language that is used to describe the situation, in order to design an appropriate response (including the right educational messages.)

- 6.8 The current Relationships and Sex Education (RSE) and health education curriculum states that by the time a pupil leaves secondary school they should understand “that sharing and viewing indecent images of children... is a criminal offence which carries severe penalties including jail.”¹¹ They should also know “the concepts of, and laws relating to... grooming.”¹² We would recommend that this topic is made a higher priority within the curriculum and covers more aspects of the issue than simply the law. It is important to ensure that children are having open conversations about these topics from a young age (both boys and girls) and know what to do if something happens.
- 6.9 We recommend that each school has a trained RSE and PSHE specialist who is able to comprehensively educate children on the nuances about online abuse and sexual exploitation, and what healthy relationships look like. As shown from our work, this education needs to be provided from a much earlier age (particularly before the age of 11 for young girls.) Age-appropriate education is needed during primary school, and then continual sessions on internet safety throughout secondary school too.

7. Encouraging effective reporting mechanisms and ensuring confidence in them

- 7.1 One of the important ways to end online violence against girls is through ensuring that they have a high level of confidence that any abuse they report will be taken seriously and something will happen. The internet safety charity, Childnet, recently conducted research amongst young people that shows that this is currently not the case.
- 7.2 **The research found that fewer than half of young people trust their favourite apps, games, and social media platforms to remove content if it is reported to them. Children and young people are often more likely to block someone behaving inappropriately than report them online. Nearly a third of children say they sometimes do nothing when they are upset or worried about something online.**¹³
- 7.3 The IWF has an excellent track record for reducing the quantity of CSAM hosted in the UK – from 18% in 1996 to under 1% today. We have already been involved in developing the interim CSEA Code of Practice, however we would be keen to share our 25 years of expertise with the Government in shaping the solutions related to the online aspects of VAWG.
- 7.4 We believe that one of the important considerations for Government is to legislate and develop policies that are flexible enough to adapt to the ever-changing nature of technology. We believe that we are well-equipped to provide assistance with this due to our track record of innovating and developing as technology changes.
- 7.5 We also believe that the numbers of child sexual abuse images and videos being circulated can be reduced on the clear web by internet companies joining the IWF and taking our technical services. The Government needs to assist both industry and the IWF in encouraging the take-up of those services. Some of the IWF's successes:
- 7.5.1 We have removed millions of criminal images and videos.
 - 7.5.2 We remove 45% of content we identify as hosted in the UK in under two hours, with our fastest removal time being under four minutes.

¹¹ <https://www.iicsa.org.uk/key-documents/15023/view/HOM003273.pdf> p.28

¹² <https://www.iicsa.org.uk/key-documents/15023/view/HOM003273.pdf> p.29

¹³ <https://d1afx9quaogywf.cloudfront.net/sites/default/files/Blogs/Reporting%20Research%20Final.pdf>

- 7.5.3 We create and develop the right technology which directly benefits victims and disrupts offenders. We do this by bringing together industry tech experts to work with our technical team and analysts. We then share this technology with our Members to multiply its benefits.
- 7.6 The IWF recently partnered with the NSPCC to develop an online tool called Report Remove. This allows under 18s to self-refer sexual images of themselves that may have been shared online and is the first tool like this anywhere in the world. We would ask the Government to invest in mechanisms like this, so that young girls are able to report and have confidence that images of themselves will be taken off the internet.
- 7.7 We would also suggest that the Government looks to invest in existing successful educational organisations to compliment what children are being taught in school, and to equip the adults in their lives with key information. The UKSIC reaches millions of children and their parents/carers each year with educational resources and messages.
- 7.8 The UKSIC ran Safer Internet Day in February 2021 to facilitate a national conversation about using the internet safely. This reached 51% of children and 38% of their parents and carers with educational resources and messages.**
- 7.9 The UKSIC was previously 50% funded by the EU (which was then match-funded by industry). After December 2021, the Centre will no longer receive funding from the EU. We recommend that the UK Government invests the £1.3 million needed to keep the Centre functioning.

7. Conclusion

- 7.1 With all of these recommendations in mind, we would finally urge the Government to develop a coordinated response across departments. As this is an issue that involves multiple stakeholders, from industry to schools to parents to law enforcement, there must be a solution that brings together insights from across Government.