



Better Internet for Kids – Update.

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 an international hotline based in the UK, funded by the internet industry and European Commission, which provides a secure and anonymous place for 2.5 billion people globally to report suspected child sexual abuse material in their local language. If these reports are confirmed as CSAM, our analysts work to have that imagery removed from the internet - wherever it may be hosted in the world.
- 1.2 The IWF's vision is an internet free from child sexual abuse and we are a charity that works in partnership with the technology industry, law enforcement (including Europol), the European Commission and other Government's globally to achieve that aim.
- 1.3 The technical tools and services we provide help to keep technology companies platforms and services free from CSAM. The IWF has over 170 Members from the internet industry who deploy our services to combat the spread of CSAM on their platforms.
- 1.4 Along with 45 other hotlines around the world, the IWF is part of the International Association of Internet Hotlines (INHOPE) and through our role as the UK Safer Internet Centre are also part of the Insafe Network, the European network of Awareness Centres promoting a safer internet.
- 1.5 **In 2020, more than half (57%) of all the unique child sexual abuse URLs exchanged through INHOPE's database in 2020 were identified by the IWF.**
- 1.6 **In 2020, the IWF assessed and removed 153,383 reports confirmed as containing CSAM. This was a 16% increase from 2019. Each report can contain from one to thousands of individual images or videos, so this equates to millions removed that year.**

2. Recommendations

1. **Update the Better Internet for Kids Strategy to account for new and emerging threats to children online, particularly in light of the impact of the COVID-19 crisis.**
2. **Replace the EU Directive 2011/93 with a Regulation to resolve many of the current transposition issues.**

3. **Member States should ensure that children are given constructive education about healthy relationships in a digital age and online safety, and should ensure that teachers are properly equipped to deliver this.**
4. **Continue funding Safer Internet Centres and Safer Internet Day throughout Europe to deliver key educational messages and resources.**
5. **Introduce age verification for adult websites.**

3. The impact of COVID-19.

- 5.1 Since 2011, the IWF has seen new trends when it comes to CSAM, partly exacerbated by the COVID-19 pandemic and associated lockdowns. At the start of the pandemic, the IWF was one of the first organisations to warn that there might be an increased risk to children, with both children and sexual predators spending much more time online and alone.
- 5.2 Europol's 2021 European Union Serious and Organised Crime Threat Assessment (EU SOCTA) highlighted the continuous increase in activities related to online child sexual abuse over recent years, as well as the accelerated digitalisation in the EU due to COVID-19 and the likelihood that criminals will continue to use new technologies.
- 5.3 In particular, the IWF has seen a dramatic increase in "self-generated" indecent images of children, often where young girls are groomed or coerced into sexual activity in front of a webcam or camera-enabled device which is then captured by an offender. Our analysts often see this taking place in the child's bedroom or other domestic settings.
- 5.4 **So far in 2021 we have seen a 117% increase in this type of content. It now makes up over two thirds of the CSAM our analysts assess and remove.**
- 5.5 **Most victims of "self-generated" abuse are 11-13 year old girls.**
- 5.6 The Better Internet for Kids Strategy should reflect the impact of COVID-19, including the new context that means many more children are spending time online from a younger age. The Strategy should focus on preventing the creation of "self-generated" indecent imagery, for instance educational programmes that equip children to understand the grooming techniques of perpetrators.
- 5.7 As the majority of victims are 13 or younger, the Strategy should take this into account and both educational and other interventions should be targeted at younger children as well as teenagers.

4. Replace the EU Directive 2011/93 with a Regulation.

- 4.1 We would recommend that the 2011 Directive be replaced by a new CSAM Regulation so that Member States would have to comply with this, resolving many of the current transposition issues. We think this would motivate Member States to meet their obligations at a faster pace.
- 4.2 It is essential that Member States are pushed to introduce solutions to tackle CSAM as fast as possible, particularly given the current threat level. According to the WePROTECT Global Alliance's 2019 Threat Assessment, there are 750,000 individuals estimated to be looking to connect with children across the globe for sexual purposes online at any one time. The EU must

have a zero-tolerance approach to prevent new content being created, any more children being victimised and content being allowed to be hosted in the EU.

- 4.3 This would also mean that a set of Europe-wide standards and definitions of CSAM could be introduced, which would allow companies to act upon illegal content more swiftly and with simpler systems in place.

5. Educational Programmes and Initiatives.

- 5.1 A key part of the Better Internet for Kids Strategy is the importance of effective educational programmes to empower and protect children online, providing them with the tools to recognise what abusive dynamics look like and to have confidence that action will be taken if they disclose abuse to an adult.
- 5.2 Educational messages should not make children feel shame about or responsible for their abuse, but should be constructive and empowering.
- 5.3 School curriculums can play a significant role in facilitating open discussions with young people about healthy relationships in the current digital age, however research has found that, at least in the UK, over 40% of schools do not have professional development in place for staff when it comes to online safety. Staff in all Member States must be well-equipped to teach their students about online safety.
- 5.4 Unfortunately at the moment, many young people are gaining an understanding of relationships at least partly through viewing pornography online. We would urge Strategy 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, we should still be working towards solutions to this, including effective educational initiatives.
- 5.5 The Safer Internet Centres throughout Europe play an essential role in delivering high-quality educational messages, including through Safer Internet Day each year. This reaches millions of children throughout the continent each year and should be funded to continue providing this excellent service.
- 5.6 Educational initiatives should be focused around the current and emerging threats to children online, for instance the current rise in grooming and coercion to produce “self-generated” indecent images. We recently ran a campaign with two strands about “self-generated” abuse, one aimed at children and one aimed at their parents and carers. We conducted a survey before and after the campaign, finding that if parents initiate just one good conversation with their child, it is much more likely that their daughter will disclose any abuse or inappropriate request on social media.
- 5.7 Member States should run similar awareness programmes that equip their citizens with knowledge about these issues and encourage them to have constructive conversations about it.

6. Conclusion

- 6.1 It is complex to keep children safe online whilst still maximising the benefits of social media (which was for instance a vital way for children to learn and remain connected throughout COVID-19.) Doing this effectively means that various different stakeholders must work together to provide educational support alongside regulation and law enforcement measures.

6.2 We would encourage the Commission to implement our recommendations, and to work with Member States to ensure that children throughout Europe receive key educational messages relevant to the current online safety landscape and have confidence in disclosing any abuse or inappropriate contact online, and that teachers and professionals feel equipped to deliver these educational initiatives.