



## **Online Safety Bill and Child Criminal Exploitation (CCE)**

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### **Barnardo's**

Barnardo's is the UK's largest national children's charity. Our ambition is to achieve better outcomes for more children by building stronger families, safer childhoods and positive futures. In 2020-21 Barnardo's supported 382,872 children, young people, parents and carers through 791 services and partnerships throughout the UK.

### **Redthread**

Redthread empowers young people to thrive as they navigate the challenging transition to adulthood by integrating trauma-informed youth work into the health sector. We have experienced significant development since our inception in 1995, moving from a small, local youth charity to a national organisation operating across multiple locations.

### **Catch22**

Catch22 is a social business, a not-for-profit business with a social mission. For over 200 years we have designed and delivered services that build resilience and aspiration in people and communities. As a social business we have the heart of a charity, and the mindset of a business.

### **UK Safer Internet Centre**

The UK Safer Internet Centre are a partnership of three leading organisations: [Childnet International](#), [Internet Watch Foundation](#) and [SWGfL](#), with one mission – to make the internet a great and safe place for children and young people.

## Summary

- Child criminal exploitation and child sexual exploitation are intrinsically linked, and often overlap, including in how children are recruited.
- Online platforms are increasingly being used to engage children and young people, and to keep them trapped in a cycle of criminal behaviour. This includes through social media, gaming, and social media sites. Exploitation that begins online may transition offline.
- The COVID-19 pandemic and lockdown measures have driven an increase in online exploitation, as children spent more time online and perpetrators' traditional methods of recruitment were disrupted. Evidence suggests that, post-lockdown, rates of online forms of exploitation have been sustained.
- Despite this growing harm facing children and young people, child criminal exploitation is not included as a potential harm to children in the Online Safety Bill.

## Recommendations

- Child criminal exploitation should be included as a potential harm to children and young people in the Online Safety Bill
- Policy makers should recognise that child criminal exploitation often happens alongside sexual or other forms of exploitation
- The Bill should instruct Ofcom to produce a separate code of practice for child criminal exploitation, including detailed procedures that Ofcom would require companies to take to address it
- The Bill should include an independent resolution process
- The Internet Watch Foundation should be listed as co-designators alongside Ofcom on the face of the Bill
- The Bill must promote the education of children and young people about their rights and responsibilities online, promote media literacy, and ensure literacy by design.

## Background

Children and young people relied on online platforms more than ever for communication, education and entertainment during the COVID-19 pandemic and lockdowns. However, reports have indicated that this increase in time spent online has resulted in children and young people becoming more vulnerable to both criminal and sexual exploitation<sup>1</sup>.

Given the hidden nature of this phenomenon it is difficult to get an accurate picture of the extent of child exploitation that is taking place in the UK. However, there are

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<sup>1</sup> <https://www.theparliamentmagazine.eu/news/article/europol-voices-concern-over-rise-in-online-child-abuse-during-pandemic>

indications that this is a growing problem. In 2019, the Children's Commissioner for England estimated that there were 27,000 children at high risk of gang exploitation.<sup>2</sup>

The Online Safety Bill's passage through Parliament provides an opportunity to strengthen legislation on online grooming for the purpose of child criminal exploitation.

**This APPG is calling on the Government to amend the Online Safety Bill so that Child Criminal Exploitation is listed as a specific harm to children in the legislation.**

**This APPG has concluded that immediate priority should be given to including child criminal exploitation as a potential harm to children and young people in the Online Safety Bill.**

Policy makers should remember that, **to a young person who has grown up in the digital age, what happens in the online world is as real as what happens offline.**<sup>3</sup> The voices of children and young people should therefore remain central in combatting the risks that they face online.

### **What is online child exploitation and what forms does it take?**

Online exploitation is when someone online uses their power to make a child undertake sexual or criminal activity, either online or offline.

Those seeking to exploit children and young people increasingly contacted their victims online during the pandemic and have continued to use technology to manipulate, coerce and deceive at scale.<sup>4</sup> **The UK Safer Internet Centre** reported to the APPG meeting that offline vulnerabilities are translated into increased risk online.

### **Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)**

Child criminal exploitation (CCE) is defined by Barnardo's as when another person or persons manipulate, deceive, coerce or control the person to undertake activity which constitutes a criminal offence where the person is under the age of 18.<sup>5</sup> Child sexual exploitation (CSE) occurs when a child or young person is given things, like gifts, drugs, money, status or affection, in exchange for performing sexual activities.<sup>6</sup> CCE and CSE are often intrinsically linked, and should not be considered separately. A number of online platforms have been used to engage children and young people, including social media, gaming platforms and live-streaming sites. The extreme sense of loneliness that many young people experienced during the pandemic resulted in many using a variety of social media platforms to establish and maintain connections.

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<sup>2</sup> <https://www.childrenscommissioner.gov.uk/wp-content/uploads/2019/02/CCO-Gangs.pdf>

<sup>3</sup> <https://www.lincolnshire.gov.uk/downloads/file/3656/tcs-online-exploitation-briefing>

<sup>4</sup> <https://www.nationalcrimeagency.gov.uk/news/online-is-the-new-frontline-in-fight-against-organised-crime-says-national-crime-agency-on-publication-of-annual-threat-assessment>

<sup>5</sup> <https://www.barnardos.org.uk/sites/default/files/2021-10/Exploited%20and%20Criminalised%20report.pdf>

<sup>6</sup> <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/child-sexual-exploitation/>

Children who are criminally and/ or sexually exploited are recruited in a similar way, demonstrating the importance of recognising the interplay that exists. When exploitation happens online, **Barnardo's** practitioners told the APPG meeting that those that cause harm may;

- Seek to engage a child in conversations by text or on a variety of online platforms including through social media, gaming platforms and live-streaming sites.
- Promise money, gifts or other rewards for engaging in criminal or sexual activity.
- Offer protection from other peer groups or bullies.
- Send or post sexually explicit images and/ or videos of themselves or coerce the victim to do this.
- Other children or adults that harm may extort money from their victims by threatening to send images, videos or copies of conversations to the young person's friends and family unless they take part in further sexual and/ or criminal activity.

**Barnardo's** also noted that perpetrators can often exploit children's longing for a sense of belonging and family, promising a family unit and luxurious lifestyle. Perpetrators may then use threats or blackmail to force, coerce or persuade young people to continue this activity. Images and conversations might be shared with networks or peers. Abuse that begins online may transition offline, with young people being invited to parties and given drugs and alcohol, so that they can be sexually abused by one person or multiple people.<sup>7</sup>

### Case study from Barnardo's - Male, Aged 17

I've never felt love from my own family. As in my biological family. Most of my childhood has been in care. I guess I just wanted to feel part of something. Kind of like having my own family and something to feel part of. They first messaged me on Insta asking if I wanted to make a few quid. I asked how much and they said I could earn £600 a week. I'm thinking what?! Yes please! They said if I helped them out they'd help me out and I would never have to worry about clothes or food or phone credit again. One of them even gave me his credit card details so I could just buy what I wanted. For every gist they wanted me to run a few parcels. Only local so it didn't feel like a big deal. But the demands got worse and before I knew it, I was holding bags of the stuff in my room for them, with knives and loads of money and stuff. They'd beat me up if I didn't do what they said. There was just no escape. It felt like all my fault.

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<sup>7</sup> <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/child-sexual-exploitation/>

**Barnardo's** practitioners reported to the APPG meeting that social media apps are being increasingly used to exploit children and keep them trapped in a cycle of criminal behaviour. This includes through:

- Using technology and social media platforms to track and monitor movements of children and young people, including through using GPS technology to pinpoint the location of uploaded or shared photographs, and using features that provide the location of devices in real time, such as in Snapchat.
- Making initial contact and grooming children through platforms used by children and young people, such as sharing posts in trap-houses with money, trainers, and weapons.
- The use of electro-currencies and credits being used to groom others into activities.
- Live streaming to perpetrate abuse in real time.
- Coercing children and young people to produce videos and images of their own sexual abuse.

It was also reported by **Barnardo's** practitioners that a surge in the use of online dating apps by under 18s has facilitated both sexual and criminal exploitation. During the initial lockdown period, there was an increase in the use of dating apps amongst children and young people, including sites such as Omegle, Tinder, ooVoo and MyLOL. Concerningly, before recently implemented changes, 7% of Tinder users were 13-17-year-olds.<sup>8</sup>

Apps such as TikTok and other social media apps are renowned for heavily promoting the use of dating apps amongst children and young people, seeing younger influencers encouraging children to use these adult-centred apps. Boredom and isolation that children felt during the lockdown period also caused many children to use such apps, as they sought ways of speaking with other people. Although age restrictions are in place on dating apps, they are easily overridden, vastly increasing the risk of online exploitation.

Other social media apps used by children and young people, such as Snapchat, are also facilitating sexual and criminal exploitation. **Barnardo's** practitioners told the APPG meeting that it is possible for an individual to have over 4000 friends on the app. There is also a feature known as 'Quick Add' – a quick way to add lots of people as your Snapchat friends at any given time. Practitioners reported seeing a pattern where individuals are being targeted by the use of the Quick Add function.

**Social Switch** is a project that is co-delivered by Catch22 and Redthread, which aims to explore how social media's relationship to youth violence is understood, tackled and solved, and has trained 1600 professionals so far across London to recognise the signs of online child criminal exploitation and child sexual exploitation.

They reported that **97% of referrals into their exploitation and missing services involved online harm in some way** and they saw a spike in online activity during the COVID-19 pandemic, including referrals where young girls were offered significant amounts of money for drug running and county-lines activities. **Social Switch** also shared during the APPG meeting that they have seen cases where

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<sup>8</sup> <https://www.theguardian.com/technology/2014/feb/24/tinder-dating-app-social-networks>

perpetrators create social media ads offering young people what look like genuine job opportunities to attract young people that they aim to exploit.

Importantly, **Social Switch** also highlighted the need to ensure that young people are enabled to thrive online and are not held back by the fear of exploitation.

During the APPG Meeting, the **UK Safer Internet Centre** reported that over the pandemic, they saw an exponential increase of child sexual abuse imagery online. They reported that the [Internet Watch Foundation](#) had found that of the 252,194 webpages actioned during 2021, almost three quarters (182,281 or 72%) were assessed as containing 'self-generated' imagery. This might look like a child alone in a domestic setting using a camera-enabled device and being groomed into sexual activity which is captured by a perpetrator on the other side of the online interaction. This is a 28-percentage point increase on 2020 when 44% of actioned reports (pr 68,000) were self-generated. 81% of this imagery showed 11-13-year-old girls. There has also been a three-fold increase in the amount of imagery of 7-10-year old children since 2020.<sup>9</sup>

The **UK Safer Internet Centre** also noted that the Revenge Porn Helpline saw a 40% rise in contact during the pandemic.<sup>10</sup> This number did not go down after the lockdown period, meaning that this form of online exploitation has been sustained post-pandemic. The **UK Safer Internet Centre** also reported that calls made to the helpline in relation to sextortion (a form of blackmail of adults which involves threatening to publish sexual information, photos or videos) were mostly from men. 90% of sextortion victims contacting their helpline were male, who were often being targeted by criminal gangs.

The **UK Safer Internet Centre** shared research from [Youthworks Consulting](#) with the APPG meeting, which looked at how offline vulnerabilities can impact online experiences. It found that young people with an eating disorder are eleven times more likely to see content encouraging self-harm online; eight times more likely to say that someone online tried to persuade them into sexual activity; and five times more likely to fall for a scam.<sup>11</sup> When looking at risk online, they noted that age and being a child is just one factor that can increase vulnerability, but other intersecting risks can also add to an individual's vulnerability. At the same time however, those who are vulnerable online are the people most likely to benefit from digital access.

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<sup>9</sup> <https://annualreport2021.iwf.org.uk/Trends/SelfGenerated>

<sup>10</sup> <https://saferinternet.org.uk/blog/revenge-porn-helpline-report-2021>

<sup>11</sup> <https://www.internetmatters.org/wp-content/uploads/2020/10/Internet-Matters-CyberSurvey19-Digital-Life-Web.pdf>



### **Case study from Barnardo's - Female, Aged 13**

I got this random add on Snapchat. I get random adds all the time. It was from this lad who started messaging me. Well, at least I thought he was a 'lad'. He always gave me compliments and would tell me how beautiful I am. He said I was the fittest girl he had ever seen. I used to vent to him when my Mom annoyed me and he always understood. He understood me more than anyone else did. That's how it felt anyway. He used to send me naked pics of himself and wanted me to send them back. 'Our secret' he would call it and that if I 'loved him' like he 'loved me', I wouldn't even hesitate. He would say he wanted to get to know me better by speaking to my friends too so I sent him their snaps and he would message them. He wanted to meet me. He'd ask all the time. He wanted to take me to places I'd always wanted to go like nightclubs and shisha bars. My Mom found all the messages on my phone and that's how I ended up working with Barnardos. Turns out he wasn't a 'lad' he was a 36 year old man. I didn't see it at the time but he took advantage of me and made me do things I would never normally do which is really hard to deal with.

### **What can be done to combat online child exploitation?**

**Immediate priority should be given to including child criminal exploitation as a potential harm to children and young people in the Online Safety Bill.**

The Bill attempts to protect young people from legal but harmful material and tackle illegal activity that threatens their safety. Child sexual exploitation is explicitly named as a threat to the safety of children, but the dangers of child criminal exploitation are not recognised within the Bill.

**Policy makers should recognise that child criminal exploitation often happens alongside sexual or other forms of exploitation<sup>12</sup>.**

The Bill should include provisions that ensure social media platforms are required to remove illegal content that related to child criminal exploitation, similarly to how they are required to for child sexual exploitation. Platforms should also have a duty to report any child criminal exploitation and content that they encounter.

**The Bill should also instruct Ofcom to produce a separate code of practice for child criminal exploitation and include detailed procedures that Ofcom would require companies to take to address it.**

Codes of practice for child online safety and child criminal exploitation must be binding and apply to all services likely to be accessed by children.

**The Bill should also include an independent resolution process.**

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<sup>12</sup> [http://berks.proceduresonline.com/west\\_berk/p\\_ch\\_crim\\_exploit.html](http://berks.proceduresonline.com/west_berk/p_ch_crim_exploit.html)

Currently, the Video Sharing Platform Regulation requires platforms to provide for an impartial out-of-court procedure for the resolution of any dispute between a person using the service and the provider.<sup>13</sup> This requirement is already in place for video sharing platforms based in the UK, such as TikTok and Twitch. However the Online Safety Bill is looking to dismantle this obligation.

The Bill should continue the obligation of an impartial dispute resolution process, making it easier and more constructive for vulnerable individuals and families who have experienced harm online to access an impartial process, in the event that a platform does not adequately respond to their concerns.<sup>14</sup>

Creating a user advocacy organisation in the Online Safety Bill, as proposed by the NSPCC, would also be an important step to ensure the Bill offers the strongest protection for children online.<sup>15</sup> User advocacy arrangements are used in nearly all regulated sectors, including energy, water, post, and transport and play a key role in representing users, particularly vulnerable groups, and to ensure that their voices are heard and appropriately counterbalanced against the backdrop of well-resourced and vocal regulated companies.<sup>16</sup>

**The Bill should list the Internet Watch Foundation as a co-designated body for child sexual abuse material to assist Ofcom.**

The Internet Watch Foundation has an excellent track-record in delivering success in minimising the spread of illegal content, the dissemination of the content, and ensuring its swift removal by working with companies.<sup>17</sup> Listing the Internet Watch Foundation as a co-designated body for child sexual abuse material to assist Ofcom would recognise the expertise of the Internet Watch Foundation and ensure the successful implementation of the Online Safety Bill.

**The Bill must promote the education of children and young people about their rights and responsibilities online, promote media literacy, and ensure literacy by design.**

Funding should be made available for projects, such as **Social Switch**, to educate children and young people about their rights online.

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<sup>13</sup> <https://www.ofcom.org.uk/online-safety/information-for-industry/vsp-regulation>

<sup>14</sup> <https://swgfl.org.uk/magazine/online-safety-bill-set-to-remove-essential-support-for-victims-of-online-harm/>

<sup>15</sup> <https://www.nspcc.org.uk/globalassets/documents/research-reports/advocacy-policy-paper.pdf>

<sup>16</sup> <https://www.nspcc.org.uk/globalassets/documents/research-reports/advocacy-policy-paper.pdf>

<sup>17</sup> <https://www.iwf.org.uk/media/rnrbgopl/online-safety-bill-second-reading-002.pdf>