

**European Commission Public Consultation  
“Safer Internet and online technologies for children”**

**Response by the UK Children’s Charities’ Coalition on Internet Safety (CHIS)**

**Introduction**

The UK Children’s Charities’ Coalition on Internet Safety (CHIS) welcomes the European Commission’s consultation, which aims to develop a full picture of current and emerging risks to children in relation to the internet and online technologies, and identify what action is needed to address them. It is clear that this work remains as necessary as ever, not least to fulfil governments’ obligations to implement children’s rights as laid out in the 1989 United Nations Convention on the Rights of the Child (UNCRC)<sup>1</sup>, and Article 24 of the EU’s Charter of Fundamental Rights according to which Member States agree that ‘Children shall have the right to such protection and care as is necessary for their well-being’.

Challenges related to the internet and online technologies transcend national borders and therefore concerted action at European and international levels is crucial to address them. CHIS believes the European Commission and other EU Institutions have a continuing role to play, including through supporting the work of the range of stakeholders in this area, facilitating the exchange of best practice and legislating where appropriate.

The current development by the Commission with the support of other EU institutions of a European strategy on children’s rights gives added impetus to European efforts to help safeguard children’s rights across the EU and beyond. CHIS hopes that this will also help lead to a higher priority being accorded to combating online risks to children, and protecting children who have been victims of any forms of internet-related abuse, by both Member States and third country governments.

CHIS also encourages the Commission and Member States to ensure during the final stages of negotiations that the Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse promotes the highest possible standards for the protection of children in this regard. Following finalisation of the Convention, Member States should prioritise signing, ratifying and implementing the Convention.

**1. Fighting illegal content**

**1.1 In your opinion is there a need beyond the year 2008 to pro-actively fight against illegal content?**

Recent years have seen a dramatic expansion in the market for child abuse images and a huge increase in the volume of images in circulation. The USA and Russia are the major sources of these images, alongside to a lesser degree Japan, South Korea, China and Thailand. Unless and until some evidence emerges to suggest that law enforcement and related agencies are beginning to reduce the volume of

---

<sup>1</sup> Children’s rights in the UNCRC of particular relevance here include the right to protection from all forms of sexual exploitation and abuse (Article 34), from other forms of exploitation (Article 36), the right to rehabilitation for children who have been abused or exploited (Article 39), and protection from all forms of violence (Article 19).

child abuse images circulating on the internet it is clear that all of the agencies with a role to play in this space must continue their existing work, or better still step it up.

Evidence from police operations demonstrates the increasing prevalence of abuse images. In 1995 the Greater Manchester Police seized 12 images of child sex abuse, all of which were on paper or video. In typical arrests today, the number of images seized often number in the thousands or tens of thousands, reflecting the large number of images now available. For example, in 2004 Manchester police arrested one man who was found to be in possession to 1,000,000 images (Carr, 2004). Similarly, the Internet Watch foundation processed 615 complaints of online abuse images in 1996, compared with 27,750 in 2006 (Internet watch foundation annual report, 2006)

International statistics also suggest the same sharp rise in images and there is little doubt that the volume of child abuse images being distributed online is increasing at an alarming rate. Currently Interpol's Child Abuse Image database has more than 200,000 images showing the sexual abuse of over 20,000 individual children. There is also some evidence that many of the images being produced involve younger and younger children being sexually abused in ever more violent ways (Carr, 2006).

It is also important to note that despite the number of these images circulating on the internet only a small number of children have been successfully identified from these images and protected. In our view a truly 'pro-active' fight against Child Abuse Images should address the shortfall in resources for victim identification and protection as well as combating the rapid production and distribution of new images. Currently less than 500 of the 20,000 children in Interpol database have been identified and given the protection they need.

### **1.2 If so, please give indications of what kinds of illegal content/ material should be dealt with.**

As the Children's Charities Coalition on Internet Safety we are primarily concerned with the production and distribution of Child Abuse Images. We do, of course, want other criminally obscene or race hate content available on the internet to be reported and taken down in order to protect all children who are using the internet from having to view harmful or upsetting content. However our overriding concern is with the rapidly increasing numbers of abuse images on the internet and with the children who are abused in the process of producing these. We believe that combating this trade should be a top priority for all stakeholders, policy makers, NGOs, police, industry and Governments.

There is no doubt that the volume of child abuse images being distributed online is increasing at an alarming rate. There is also some evidence that many of the images being produced involve younger and younger children being sexually abused in ever more violent ways (Carr, 2006). It is also important to note that despite the number of these images circulating on the internet only a small number of children have been successfully identified from these images and protected. In our view a truly 'pro-active' fight against Child Abuse Images should address the shortfall in resources for victim identification and protection as well as combating the rapid production and distribution of new images.

### **1.3 Which should be the means of fighting the production and distribution of illegal content, in particular child sexual abuse material, and what stakeholders should take initiatives?**

In order to fight the production and distribution of illegal content a wide range of stakeholders will need to take action and initiatives. Recently, our chair, John Carr (New Technology Adviser for NCH) published a comprehensive overview of the current situation and a proposed strategy to engage with stakeholders and the public across the world raising awareness and developing international political leadership around this issue. Rather than repeat this here we attach John Carr's publication as an appendix.

Broadly speaking, the key way we see of making progress is through establishing an international network of NGOs that can engage the public and use their influence to lobby Government, Law Enforcement and Industry for change. We welcome the initiative the Commission has taken to support the establishment of such a network on a European basis. This network should be made up of national NGOs with acknowledged expertise in the field of the internet and child protection, with the purpose of providing leadership on a number of issues in which progress is currently lacking. These include: ensuring improved technical measures, better data collection and research to understand the problem and increasing education, training and awareness. The network should ensure that the expertise of NGOs is taken on board in European and international efforts to ensure children's safety in relation to online activities.

**1.4 A central element of the fight against illegal content for the Safer Internet Plus Programme has been to support an international network of civilian hotlines where the public can report illegal content, should they chance upon it online. In your opinion, is this the most appropriate way of dealing with illegal content beyond 2008? How could their co-operation with law enforcement agencies be strengthened?**

We strongly support the work of public hotlines to report illegal content. In the UK the Internet Watch Foundation operates a public hotline and has been highly successful in encouraging members of the public to report illegal material through their website at [www.iwf.org.uk](http://www.iwf.org.uk). The Internet Watch Foundation has the authority to close down illegal websites that are hosted in the United Kingdom (UK). Since its inception in 1996, the organisation has processed an average of 1,000 reports a month with more than 31,000 websites found to contain potentially illegal child abuse content. In the UK the IWF works closely with the police, not only in passing on reports but also in lending its expertise to help trace individuals responsible for criminal activities online. We see this relationship as important.

The work of the IWF and in particular the agreement between the IWF, industry and children's charities to ban 'newsgroups' hosting abuse images has resulted in considerable success in removing illegal sites that are hosting images in the UK. Where sites are hosted in other countries such as the US and Russia, these can be added to a list of sites which can then be blocked by internet service providers (ISPs) in the UK using 'cleenfeed' technology. The NSPCC working with other children's charities has enjoyed considerable success in persuading ISPs block access to child abuse images hosted from servers overseas. The NSPCC also successfully campaigned on this issue in May of 2006 and secured a commitment from the minister to try to ensure that all Internet Service Providers were blocking access by the end of 2007.

The methods above are important and valid ways of fighting illegal content but they have their limitations. The fact that sites hosting child abuse images in other

countries may be difficult to take down only underpins the need for greater international co-operation and accountability from a range of stakeholders and for clear international political leadership on this issue.. We strongly support the work of the Virtual Global Task Force but it is important to recognise that this is the product of an initiative taken at an operational level. This issue needs to be higher on the international political agenda including of the UN and the G8.

It is also important to recognise that as new technologies are being misused to increase the dissemination and sharing of child abuse images it cannot be relied on that members of the public will come across it online and report it. Next generation mobile phones (3G) can now be used to capture and share child abuse images as most include a digital camera (Palmer, 2004). MP4 players can be used to view and share video clips. There is at present no practical way to monitor the use of these devices or to interdict the transmission of illegal material between them. Peer to peer technologies allow adults with a sexual interest in children to add to and share their collection of images without having to go through intermediary or third party servers.

Other technical ways of combating distribution and consumption of images are therefore clearly needed. There is a need for industry to be increasing investment in research into possible technical solutions for example on how to filter and block illegal content and how to detect and track the illegal traffic of images. The EU could support closer cooperation with industry to achieve these goals.

### **1.5 How can other organisations support national/local and international law enforcement agencies in dealing with the production and online distribution of illegal content?**

One promising new approach has been the involvement of financial institutions in imposing sanctions on those who use a credit card to purchase images. This work is being led by the Financial Coalition, which is administered by NCMEC in the USA. The European Commission identified this issue as needing action in its July 2006 Communication 'Towards a European Strategy on the Rights of the Child'<sup>2</sup>, where it announced that it would support the banking sector and credit card companies to combat the use of credit cards when purchasing sexual images of children on the internet. The NSPCC strongly supports this approach and believe that every pressure should be brought to bear on banking institutions.

### **1.6 The internet has a global dimension: illegal content can be produced in one country, distributed from a second, and accessed/ downloaded in many countries across the world. Please specify which actions should be taken internationally. Are there specific countries which should be focussed on?**

The evidence published by the UK's Internet Watch Foundation makes it clear that two countries in particular, the USA and Russia, play a central role in the global distribution of child sex abuse images on the internet. The most recent report from the IWF found that over 90% of commercial child abuse sites appear to be hosted in the USA and Russia.<sup>3</sup> Other countries are also important, either as sources of the images or as distribution points, but the authorities in Russia and the USA in

---

<sup>2</sup> COM (2006) 367 final.

[http://eur-lex.europa.eu/LexUriServ/site/en/com/2006/com2006\\_0367en01.pdf](http://eur-lex.europa.eu/LexUriServ/site/en/com/2006/com2006_0367en01.pdf)

<sup>3</sup> The Internet Watch Foundation, 2006 Half Yearly Report, [www.iwf.org.uk](http://www.iwf.org.uk)

particular need to be persuaded to bear down on the problem in a much more effective way. The European Union should consider raising this issue in its dialogues with these countries and with other countries where it may become a problem in the future.

We also think that much more needs to be done to pool the addresses of known illegal web sites so that any and all European ISPs or mobile providers can adopt a single list to block access to all known sites. We are aware of resistance to this idea on the part of many of the hotlines in Europe, but we are wholly unsympathetic to the concerns being expressed.

We are very strongly of the view that the EU should use all the means it has at its disposal to facilitate the creation of a single list. The EU is a major funder of the hotlines and it therefore ought to be in a strong position to require compliance with a policy which is so obviously sensible and desirable, and which we know the industry also want and support.

### **1.7 Research and development of efficient technological tools (filtering systems and age recognition etc) can contribute to reducing online distribution and indirectly the production of illegal content. Which are the subjects which should be addressed when supporting the development of technologies.**

A key issue is how to ensure sufficient and effective blocking technology for all Internet Service Providers. In the UK the Government has set a target that all ISPs will block access to Child Abuse Images by the end of 2007. However, we have encountered considerable resistance from some parts of industry in terms of their willingness to use filtering technology. Representatives from industry have argued that filtering will not deal with the problem of abuse images shared through peer 2 peer software or that for some ISPs, particularly smaller ones, the costs of implementing blocking solutions are too high.

We acknowledge that blocking solutions will not solve all of the problems of child sex abuse images on the internet, but they can make a very valuable contribution and therefore ought to be pursued. As to the cost, that is a separate issue. We are not averse to the costs being defrayed through tax relief or other forms of public subsidy, but we cannot accept that cost alone is a reason why an ISP should be exempted from the responsibility to block access to child sex abuse images. This is or ought to be accepted as being part of the basic costs of doing business.

We also believe that age recognition and age verification technologies will also increasingly have a very important technological developments in relation to the internet. However, we take the view that these are more relevant to fighting of harmful content as all potentially illegal content should be taken down regardless of the age of the viewer.

### **1.8 Analysis of the psychological effects of victims and studies of how offenders use the Internet to distribute the evidence of the sexual abuse of children can also contribute to the fight against illegal online content. What are the subjects which should be addressed in these areas when conducting research?**

There is limited research into the long and short term effects on children portrayed by child abuse images. The knowledge or the belief that images of abuse cannot ever be fully recovered from the internet and deleted has a profound effect on the victims

involved and this may follow them into their adult lives. Victims may also become aware that the material involved can be used to groom and abuse other children. In light of this, there is the need not only for long-term support and treatment for the children involved but also for more research into how investigations into child abuse images are handled (especially the impact upon children when pictures are used to identify them), and the follow up therapeutic support needed for children abused in such images.

More research is also needed into the links between the *consumption* of child abuse images and contact sexual abuse against children. There is some research to suggest that many of the individuals arrested for child sexual abuse crimes have been in possession of child abuse images (Healey, 1996). An investigation by the US Postal service in 2000 found that around 35% of people who look at child abuse images are also abusers in the real world (Carr, 2004). However, there are some very different research findings on the links between viewing images and contact abuse. Professor Finklehor of the University of New Hampshire suggests the rate is 17% (i.e. 17% of all men arrested for internet related offences will also turn out to be involved in contact sexual abuse). By contrast, it is thought that a very high proportion of those arrested under operation Ore had no previous contact with law enforcement or social services.

Research on the consumption of images and their relationships to contact abuse could also usefully be used to inform sentencing practice. It has been pointed out that in the UK whereas possession of more serious images (level 4 or 5 images) attracts a higher sentence in law, less serious images are often taken to indicate that the possessor is a lesser risk to children going forward. There is absolutely no evidence to support this reasoning. The opposite may well be true i.e. someone found in possession of lower level images may, in fact, be more likely to become a perpetrator precisely because the depictions are closer to the possibility of being acted out in real life than those in more extreme pictures.

More research is also needed to explore the relationship between children and young people's downloading of child abuse images and where this crosses a threshold into sexually harmful behaviour that requires specialised assessment and intervention. It would be useful to know more about the prevalence of this activity on the part of young people, and clear research and guidance developed on when it can not be said to be part of normal adolescent behaviour but is indicative of sexual harm of other children.

The European Commission could support the development of research on these issues on a cross-Europe basis. We consider that the EU should facilitate this via an experts meeting or similar forum.

**1.9 The legal situation concerning online distribution of illegal content and indeed the definitions of what is illegal content differ across the EU member states. Which are the issues which should be addressed when harmonising legal provisions across member states?**

The 2003 Council framework decision (2004/68/JHA)<sup>4</sup> on combating the sexual exploitation of children and child pornography provides an important, albeit minimum basis for Member State legislation in the field of images of child abuse (child pornography). It recognises child pornography as a serious offence, and obliges all Member States to put in place effective and dissuasive penalties against the

---

<sup>4</sup> [http://eur-lex.europa.eu/LexUriServ/site/en/oj/2004/l\\_013/l\\_01320040120en00440048.pdf](http://eur-lex.europa.eu/LexUriServ/site/en/oj/2004/l_013/l_01320040120en00440048.pdf)

perpetrators of such abuse, among other measures. It also creates a common definition of child pornography which must be used by all Member States in transposing the framework decision into national law.

Member States were to have taken the necessary measures to comply with the framework decision by 20 January 2006. The European Commission is due to shortly produce a report on its implementation which we expect to indicate to what extent Member States' laws are now in line with this common basis, which includes making the possession of child sex abuse images illegal – something which was not the case in every Member State before the adoption of the framework decision.

National sentencing policies and attitudes of law enforcement agencies reflect the way that Member States view child pornography offences, as well as other internet-related offences against children. It is to be hoped that all Member States have taken seriously their obligations under the framework decision, especially as this impacts on their willingness to collaborate with other national and international law enforcement agencies. It can also impact on their ability to collaborate with other national and international law enforcement agencies because in those countries where dealing with child sex abuse images is accorded a low priority or low status it is unlikely that sufficient resources will be allocated either to recruiting or training law enforcement officers or providing them with the right equipment. Our view as children's charities is that these offences are not yet being accorded the priority they should be across Europe.

Following the forthcoming Commission report on implementation of the framework decision, we recommend that consideration be given to further harmonising legal responses to online offences against children, including in relation to identifying and protecting victims of child abuse images.<sup>5</sup> One difficulty is the wide differences between national ages of consent, which may determine whether an act is illegal, but which are not harmonised by the framework decision.

## **2. Fighting Harmful Content**

### **2.1 In your opinion, is there a need beyond the year 2008 to pro-actively fight against harmful content? If so, please give indications of what kinds of harmful content/ material (subjects to be covered) should be dealt with?**

Again, we think any reference to specific dates is unhelpful. What matters is a judgement about whether or to what extent sufficient progress is being made.

In the UK there are clear definitions of what constitutes potentially illegal criminal content and this includes abusive images of children, criminally obscene and incitement to race hatred content. As children's charities we recognise the difficulties in pro-actively fighting harmful (as opposed to illegal content). Harmful content, where it is not actually illegal cannot simply be taken down or removed from the internet and we know that children are likely to experiment and explore online, often

---

<sup>5</sup> Another development that the Commission should consider is the introduction in the UK Sexual Offences Act 2003 of a new grooming offence. This offence applies to all those over 18 who undertake a course of conduct with a child under 16, either online or offline, which leads to a meeting where the adult intends to engage in sexual activity with that child at the time or subsequently, and this carries a maximum penalty of 10 years.

choosing to seeking out information and engaging in behaviour that places them at risk.

We see two principal dangers posed to children and young people by the internet. Firstly they can be exposed to extremely age inappropriate content which they find disturbing or distressing, and secondly it can expose them to others that wish to bully, manipulate or harm them. Given this, we consider that we have a responsibility to pro-actively address the issues and risks posed by harmful content. We urge the EU to engage with this work through promoting the sharing of good practice between different member states around successful public education, awareness raising and technical solutions.

Overall, the dangers of harmful and unwanted content are accurately described in the consultation document although there are a range of other forms of dangerous and risky activity that may also be included. These include for example: leaving and running away from home as a result of contacts made online, enacting or imitating physical stunts found in video content, and glorifying excessive drinking or drug taking. It is also important to recognise the risks children face not only as perpetrators of violence and sexual abuse against others but also as potential victims of sexual grooming and exploitation and abuse from strangers they meet online. We know that potential abusers use the internet in order to find and meet children and young people for the purposes of sexual exploitation. Sometimes children are exploited online without contact sexual abuse taking place in the real world for example by being persuaded to send sexualised images. It is also right to recognise the threats to children's security and the potential financial dangers posed by the internet. Children may be particularly vulnerable to fraudulent financial activity.

We would also like to draw attention to the potential harm to children from the goods or services they can access online. Some banks issue payment cards to children as young as 11 years of age, which can be used by them to make financial payments. Since a reliable check on a person's age is impossible on the internet, children have been able to access age restricted goods or services that they would not have been able to get hold of in the real world. For example they have been able to gamble, buy knives, alcohol, tobacco, or adult videos.

## **2.2 Which are the means of fighting the production and distribution of harmful content and what stakeholders should take initiatives?**

In our view there are a range of stakeholders that need to be fully involved in helping to tackle the issue of harmful content and all have their own contribution to make. Here, we review what is being done so far by stakeholders in the UK to fight harmful content which are all approaches that we would recommend. We then outline where we feel some clear gaps remain.

### *The means that stakeholders in the UK have used so far to tackle harmful content*

A key stakeholder is the work of police and law enforcement. We believe that the UK police have taken a leading role, but we hope that funding will be sustained and enhanced. In the UK we are fortunate to have the recently established (April, 2006) Child Exploitation and Online Protection centre (CEOP) We are hopeful that the UK Government will allocate more resources into CEOP and will ensure more police training in the area of high tech crime and better investment in police forensic capabilities. As well as operational law enforcement CEOP is also responsible for being one visible focal point for the public for reporting child sexual abuse and for

leading prevention and awareness raising amongst adults and children themselves. As children's charities we have high hopes about the difference CEOP will make, and are fully supportive.

In the UK the great majority of consumer-facing Internet Service Providers, Mobile Phone Companies and portals have put a great deal of effort into publicising key safety messages aimed at children and young people. Through their web sites, campaigning activity and other outreach efforts, many of the children's charities themselves also make a significant contribution to this effort. Schools also have an important role to play in this respect and we consider their responsibilities below. All stakeholders have been encouraged by the political leadership shown by and through the Home Secretary's Internet Task Force on Child Protection, first established in 2001.<sup>6</sup>

#### *What more needs to be done by stakeholders?*

So far much of the effort referred to above is directed at increasing children's and young people's awareness of the risks and how to deal with them. There has also been work directed at building awareness and capacity among parents, teachers and others with responsibilities for children and young people, but we need to do a great deal more to reach out to these latter groups. We are particularly concerned that parents need to be much better equipped if they are to be able to provide appropriate and timely support to their children.

While all members of CHIS are committed to the idea and importance of awareness raising and education initiatives (see question below), we also believe there will inevitably be limits to what they can achieve. We know there are some particularly vulnerable and hard to reach children and families for whom, education and awareness initiatives will in and of themselves remain inadequate.

For this reason CHIS members do strongly believe that improved technical solutions delivered by industry must play a substantial part in helping to keep children and young people safe. We are aware that the high tech industries are deploying ever more sophisticated solutions to combat spam, hacking, phishing, identity theft. However, we consider that child protection should be top priority, and while we recognise that some companies have been devoting a great deal of time, energy and research resources to this issue we also know that much more remains to be done.

For example, we consider that filtering technology should be deployed on a much larger scale than we have witnessed up until now. The NSPCC is currently campaigning to ensure that a filtering product should be preinstalled on every computer sold into the domestic market, and that it is set by default to a high level of security. Other important technological developments to increase children's online security include systems of age verification which we believe will be a substantial break through.

---

<sup>6</sup> Launched in March, 2001, the Home Secretary's Internet task force on Child Protection brings together all the key stakeholders to promote internet safety work. This includes the UK's leading Internet Service Providers, representatives from the computer manufacturing and retailing, software houses, the mobile phone companies, credit card companies and search engine companies alongside law enforcement and children's charities.

The Commission could be very useful in particular in supporting the development of technical solutions which could be rolled out across the EU.

### **2.3 In your opinion, should the media take an active part in awareness-raising in this sphere and in what way?**

We think it is important not to get into a discussion about media management or media manipulation, much less to get into a discussion about new laws or regulations which might require or direct the media to behave in particular ways.

In a free society the media have to be allowed to decide for themselves, within the broadest parameters, how and what they must or should report or cover. In our experience, very often journalists do not pick up on or report internet related stories either because they themselves have a limited understanding of the issues or the technology, or because the issues are poorly presented to them in the first place.

There is therefore a great deal to be gained by everyone involved in this space if some resources can be devoted to helping key journalists and key news agencies to obtain a better understanding of work in this area.

### **2.4 Which role could education have in empowering children to deal appropriately with harmful content? Should it be integrated into the school curricula? If so, what would be the best ways of doing so?**

We strongly recommend that education about internet safety is fully integrated into the school curriculum. In the UK we are calling for internet safety to be integrated into (PSHE) Personal and Social Health Education which is the part of the curriculum that teaches children about respectful pro-social relationships and how to recognise abusive behaviours<sup>7</sup>. We strongly recommend that education about internet safety is not relegated to the technical aspects of safety and security online and taught in (ICT) Information Communication Technology lessons by teachers who may not have competence to teach children about safety in relationships. We know that increasingly children are spending time on the internet, and often make no distinction between activities on and offline. It is important that internet safety education is linked into the broader issues of children healthy and positive social development.

In the UK a great deal of work has been carried out so far in relation to schools. For example CEOP has recently launched a hugely ambitious programme to reach, through the schools system, one million children to present them with safety messages about online risks. In doing so, CEOP is working very closely with and in many ways is building on the excellent work being done by the British Educational Communications and Technology Agency (Becta), a standalone organization which is a major source of advice and guidance both to the DfES and individual schools. However, it is important not to depend on initiatives and good practice on the part of individual schools. We consider that internet safety should form a compulsory part of the school curriculum for every child.

We also believe that schools should take an active role in addressing issues related to 'cyberbullying' and we welcome the establishment in the UK of the DfES 'Cyber-

---

<sup>7</sup> We believe that in the UK Personal Social and Health Education (PSHE) should be made a foundation subject in schools, so that all children and young people are helped to understand the issues around sexual violence and how to keep themselves safe. Currently in the UK schools are required by statute only to teach the biological aspects of sex, contraception and sexually transmitted infections and to cover these in the science curriculum.

bullying Task Force' which is developing guidance for schools, parents and children. We believe that all schools should put into place a 'cyberbullying' strategy which is fully integrated (and seen as part of) a comprehensive behaviour policy that encompasses children's behaviour on and off line. Schools need to adopt a 'whole school' approach to positive behaviour and promote pro-social relationships between every member of the school community.

**2.5 A primary activity in the fight against illegal content for the Safer Internet Plus Programme has been to support an international network of awareness nodes which promote public campaigns informing the public of the risks to linked to the use of offline technologies and on safeguarding measures. In your opinion, is this the most appropriate way of dealing with harmful content beyond 2008? If so, please indicate in what ways this line of action can be strengthened?**

The internet and high tech industries are typically organized on a trans-national basis and they therefore sometimes find it difficult to respond to concerns or issues which are raised solely on a national basis. Thus, to the extent that it is possible to do so, NGOs can amplify their individual efforts by acting in concert with other bodies sharing the same objectives.

In the UK the role of the children's charities and NGOs acting together to lobby government and industry on these issues has been extremely important and we would like to look at ways of creating and sustaining a network of children's charities and similar bodies at a European level that can begin to act together in a similar way. Overall we need to create greater international political will and leadership to address all internet safety challenges. This challenge goes beyond simply raising awareness, which is the primary focus of the nodes.

We consider that a range of approaches are needed in order to successfully tackle harmful content. The work of awareness nodes (which in the UK is the function covered by CEOP) is appropriate and essential in increasing people's understanding of the risks of the internet and in enhancing their ability to take protective action.

However, as explained above, we do take the view that improved public awareness and understanding is only one part of the answer and should not be relied on alone. It is important that industry continue to develop effective technical solutions, filtering software and age verification in order to provide protection for some of the most vulnerable children and young people

**2.6 Efficient technologies can help to make the use of the Internet, mobile phones and games consoles safer for children to use (e.g. filtering software by ISPs or at user's computer, age verification mechanisms etc). Which are the subjects which should be addressed when supporting the development of technological tools?**

We consider that all these should be actively pursued. It is important not only that sufficient resources are dedicated to improving technical solutions but also that there is willingness on the part of industry to adopt the technical solutions that are already available. For example, we have been frustrated as children's charities at the reluctance of some ISPs to take up Cleanfeed technology and the NSPCC campaigned on this in 2006. In 2007 the NSPCC is campaigning on the failure of manufacturers and retailers of PC's to pre-install internet safety software. Broadly speaking we accept the success of the UK's self regulatory approach. However, there is an issue about how to raise the political profile and priority accorded to

children's internet safety to ensure that technological solutions are not only developed but also widely deployed.

**2.7 Research on sociological issues and analysis of psychological effects particularly of the harm to children of different kinds of harmful content can contribute to building knowledge about how to deal with these issues. Which are the subjects which need to be addressed in these areas when conducting research?**

We agree there is a need to research the impact of harmful content so that we can assist recovery with children who have been disturbed and distressed by what they have encountered online. It may also enable us to better tailor filtering technologies and solutions to protect all children from potential risks. Understanding the impact of sexual abuse through new technologies is also important in order to understand the most effective therapeutic interventions with children who have been sexually abused.

We also believe there is a need to know more about what children are doing online. The research that is available on this subject dates quickly in line with rapidly changing use of technology by young people. For example Sonia Livingstone's 2005 study, while still useful has to be seen as 'pre-social networking', and therefore no longer representative of how children engage online. We need to know what risks children take, what protective measures they engage in and what level of awareness of the risks they have. Developing this understanding is important if we are to give relevant and useful (and realistically tailored) safety advice to children and young people. This will help us to know how best we can communicate with children about the risks the internet pose, how we can realistically encourage children to act responsibly and protectively, and how we can persuade them to speak out and seek help when they do need support.

It is important to note the importance of involving children themselves in all aspects of work aiming to protect children in their online activities. Children not only have a right to have their views taken into account in all decisions which affect them (Article 12 UNCRC), but also arguably are more knowledgeable than many adults about the internet and in particular how it is used by children. The Commission should consider directly involving children and young people in decisions about the its work in this area, for example within the Safer Internet Forum, or by dedicating a meeting of the new European Forum on the Rights of the Child to this issue. A number of NGOs have significant expertise in organising the participation of children and young people which could be drawn on by the Commission in this regard.

### **3 User Generated Content and Online Communication**

#### **3.1 -3.7**

We have considered and addressed these questions in detail in sections 2.2 -2.7 already. In our view the significance of social networking sites for example, is really in bringing together onto a single site pre-existing interactive technologies such as chat, blogs, email, gaming music and videos. The risks posed are not new in and of themselves. Our advice and recommendation on this are therefore covered in section 2.

### **Conclusion**

Top priority needs to be accorded in political and financial terms by the EU, Member States and other stakeholders to fighting content which is illegal or harmful for children, to raising awareness among parents and children of the risks they face and to protecting children who are victims of related abuse including child abuse images. Especially due to the international nature of the problem, the EU has a key role to play.

In summary, CHIS believes that the European Commission can make best use of its role in this regard by:

- Supporting the work of stakeholders including the awareness nodes and hotlines, and a new network of child protection NGOs with expertise in this area;
- Facilitating exchange of expertise between governments and other stakeholders from different Member States. Some countries have advanced relatively far in efforts to combat illegal and harmful content while others are just beginning. Such exchanges could cover issues discussed above such as the role of education.
- Facilitating the creation of a single European list of known illegal websites that all European ISPs or mobile phone providers must use to block access to these sites
- Investigating the need for further legal solutions building on the 2003 Council framework decision on 'combating the sexual exploitation of children and child pornography'
- Support the development of further technological solutions to different aspects of illegal and harmful content including combating distribution and consumption of child abuse images
- Facilitating dialogue with industry to encourage a more proactive industry stance on combating illegal and harmful content
- Supporting relevant research
- Internally, through ensuring close cooperation between relevant Commission Directorate-Generals especially DG Justice, Liberty and Security, and DG Information Society.

For further information contact: