

Summary

- The Online Safety Bill does not go far enough to prevent children from accessing harmful pornographic content, which poses a **serious risk to their mental health**, and their **understanding of consent and healthy relationships**.
- Many children are **stumbling across pornographic content accidentally**, including children as young as 7.¹
- Barnardo's frontline workers say that **children are participating in acts they have seen in pornographic videos**, despite feeling uncomfortable and scared.
- The Government's Equalities Office, found that there was '**substantial evidence of an association**' between the use of pornography and harmful attitudes and behaviours towards women and girls.²
- **Pornographic content which suggests sexual activity with children is extremely harmful but is rife on mainstream pornography sites**. This content normalises children as objects of sexual desire and drives the demand for 'real' child sexual abuse material. Such content is banned from DVD, Blu Ray, and Video on Demand, but is rife across mainstream pornography sites.
- Increasingly extreme pornography can legitimise abusive behaviour, meaning that **some excessive users of pornography can spiral into viewing child sexual abuse material**, and potentially even abusing children.³
- YouGov polling for Barnardo's found that **almost 70 per cent of UK adults (69%) agree that pornography which would be illegal on DVD should also be illegal online**.⁴
- **For this reason, we are working as part of a coalition with 13 other organisations, including CEASE, NSPCC, The Internet Watch Foundation and The Children's Society calling on Peers to support calls for the Online Safety Bill to:**
 - Require all pornography websites and social media platforms to implement the same robust age verification which ensures that regulated services are satisfied beyond reasonable doubt that a user is 18 years old or over. This should be brought in within six months of the Online Safety Bill becoming law.
 - Address the parity between offline and online standards and protect children by preventing content from being uploaded online if it would fail to attain an R18 certification and contains prohibited content.

1. Robust Age Verification

Since the decision not to enact Part 3 of the Digital Economy Act in October 2019, Barnardo's have found that it is likely that children will have accessed pornographic content **54 million times** at a minimum.

- Research by the British Board of Film Classification (BBFC) has found that children are coming across pornography online from as young as seven. Their study also shows that half of 11- to 13-year-olds have seen pornography at some point.
- Many children stumble across pornographic content accidentally, unwittingly searching terms like 'sex' or 'porn' without knowing what they mean.

¹ <https://www.bbfc.co.uk/about-us/news/children-see-pornography-as-young-as-seven-new-report-finds>

² <https://www.iicsa.org.uk/key-documents/28604/view/INQ006736.pdf>

³ <https://www.lucyfaithfull.org.uk/featured-news/isolation-unemployment-and-escalating-pornography-habits-contribute-to-a-record-rise-in-people-seeking-help-to-stop-viewing-sexual-images-of-children.htm>

⁴ <https://www.barnardos.org.uk/news/almost-70-uk-adults-support-tighter-controls-online-pornography-content>

- Children under 10 are increasingly visiting commercial porn mega-sites like Pornhub, and this group accounts for one in every ten visitors and 22% of underage visitors to the site.⁵
- According to research by the British Board of Film Classification, almost half of the top 100 pornography sites visited carry content which features characters from children's cartoons or characters that children would recognise – including characters from Frozen, Scooby Doo and The Incredibles.⁶
- The Ofsted Review into peer-on-peer abuse in schools found that the prevalence of children and young people seeing explicit material they do not want to see and being pressured to send 'nudes' is a much wider problem than schools can address.⁷

Viewing pornography can damage children's mental health, distorting children's understanding of healthy relationships, and normalising abusive sexual behaviour.

- Barnardo's frontline workers say that children are participating in acts they have seen in pornographic videos, despite feeling uncomfortable and scared. Children and young people are seeing these acts are an expected part of a relationship and believe that if they feel otherwise there must be something wrong with them, rather than identifying abuse.
- A survey by the NSPCC and the Children's Commissioner for England found that 44% of boys aged between 11 and 16 who regularly viewed pornographic content reported that it gave them ideas about the type of sex that they wanted to try.⁸
- Research shows that 88% of scenes in online pornography show physical aggression, and 94% of this is directed at women. This reinforces gender stereotypes and leads to higher rates of gender-related violence amongst young people.⁹ It also leaves girls feeling that violence during sex is normal and 'expected'.
- Barnardo's frontline services say children they support are watching pornography depicting illegal acts, violence and child abuse. We see first-hand that watching this content harms children's mental health and can normalise aggressive, coercive and harmful sexual activity.

The Government must strengthen age verification within the Online Safety Bill.

- All pornography websites and social media platforms should be required to implement the same robust age verification which ensures that regulated services are satisfied beyond reasonable doubt that a user is 18 years old or over. This should be brought in within six months of the Online Safety Bill becoming law.
- Robust, third-party age verification is already used extensively to protect children in other areas, including from online gambling, or from purchasing alcohol or knives online, and protects the privacy of the user.
- As it stands, the Bill fails to create a clear definition of what constitutes as 'robust' age verification, with Clause 11(3)(a) requiring action to 'prevent children of any age from encountering... content that is harmful to children (for example, by using age verification or another means of age assurance)'.
- The Bill also includes loopholes which could allow pornography companies to get around age verification measures.

⁵ <https://www.netnanny.com/blog/the-detrimental-effects-of-pornography-on-small-children/>

⁶ <https://www.bbfc.co.uk/about-us/news/new-bbfc-research-reveals-children-are-more-exposed-to-sites-specialising-in-non-photographic-pornography-compared-to-adults> and BBFC, 2022, 'Non-Photographic Images of Child Sexual Abuse: BBFC Content Investigation

⁷ <https://www.gov.uk/government/publications/review-of-sexual-abuse-in-schools-and-colleges/review-of-sexual-abuse-in-schools-and-colleges>

⁸ <https://www.childrenscommissioner.gov.uk/wp-content/uploads/2017/06/MDX-NSPCC-OCC-Online-Pornography-Report.pdf>

⁹ <https://pubmed.ncbi.nlm.nih.gov/20980228/>

- Pornography sites which fall under Part 3 of the Online Safety Bill could argue that implementing age verification would have a disproportionate cost to them, which is allowed by Clause 9(9)(b).
- Further, in Clauses 3(5) and 67(4), the Bill mandates that services must either have a 'significant number of UK users' or UK users form 'one of the main target markets for the services (or the only target market).' If the UK isn't the target market, which for many pornography sites it isn't, as the US is a bigger market, our children could be left without protection.
- Pornography sites are commercially incentivized to resist or ignore age verification, since their business model depends on maximizing the number of visitors to the site. An adult company has already admitted to Ofcom that they reject stronger age verification because it would impact its profitability.¹⁰ We cannot allow profits to come before children's protection.
- We know how far pornography companies will go to fight regulation and to find ways around requirements.
- Previously, pornography giant Pornhub poured its energies into creating its own Virtual Private Networks to allow underage users to bypass controls put in place by Internet Service Providers.
- In France, the publishers of Pornhub, YouPorn and RedTube recently sought to challenge the law in its two highest courts regarding age control of internet users. They lost, but the French legislation does not specify what form of age verification should be used.
- If the Bill remains unclear on this, it is very likely that the same pornography companies will keep challenging in the courts to stop age verification from becoming a reality here in the UK too.

Barnardo's Case Studies

A recently opened Barnardo's Harmful Sexual Behaviour service has seen over half of their referrals so far cite the viewing of pornography as a factor in the children's behaviour.

Children such as George. George is now 17 and has experienced significant trauma in childhood. He has a history of viewing pornography involving BDSM/torture/humiliation of girls as young as 8 and has an ongoing desire to continue to watch pornography of this nature. He has fantasies of sexually harming younger girls.

Billy is 14 and has been watching extreme pornography for several years. He has expressed that he 'wants to rape a girl' at school. He has also experienced childhood trauma.

****Please note all names have been changed****

2. Pornographic content that is illegal offline, but legal online

- Pornographic content which suggests sexual activity with children is prevalent online, but is illegal to own offline, for DVD or Blu-Ray, or for Video on Demand.
- This includes pornographic content which depicts sexual activity with actors or characters who look like children: petite, young-looking performers made to look underage through props such as stuffed toys, lollipops and school uniforms and sexual activity between family members, particularly step-families. This content is extremely harmful, sexualising children and driving the demand for 'real' child sexual abuse material.
- Depictions of sexual activity which may relate to children are extremely prevalent online. In 2019, 39 billion searches were made on Pornhub, with one of the most

¹⁰ <https://www.thetimes.co.uk/article/online-safety-bill-must-do-far-more-to-protect-children-from-porn-xj0dxrtv>

frequent search terms being 'teen'.¹¹ In 2021, 'step mom' was the 7th most searched term on Pornhub worldwide.¹²

- Although commercial pornography sites such as Pornhub have banned certain search tags and depictions such as 'children', 'underage' and 'child young', CEASE have found that content which clearly suggest underage sexual activity remains prevalent. Pornhub search tags including 'babysitter', 'classroom teacher', 'young', 'virgin', 'little', 'tiny', 'exxxtrasmall' and 'barely legal' are still permitted. Examples of titles of hosted videos include 'F***ing my cute stepdaughter while she studies for a test' and 'Cute schoolgirl gets f***ed by her English teacher'.¹³
- Such depictions of sexual activity with the title 'teen' are often particularly violent. According to a study which analysed the content of the three most accessed pornographic websites in the UK (Pornhub, Xhamster and Xvideos), the three most common words in videos which contained coercion and exploitation were 'schoolgirl', 'girl', and 'teen'.¹⁴ Although 'teen' could legitimately refer to those over 18, much of the content did have a focus on sex with underage girls, with titles including terms such as 'pigtails', 'homework' and 'braces'.¹⁵ Further, the most frequent form of sexual violence found in pornographic content was sexual activity between family members.¹⁶
- The Government's Equalities Office, found that there was 'substantial evidence of an association' between the use of pornography and harmful attitudes and behaviours towards women and girls.¹⁷

Case Study from Lucy Faithfull Foundation¹⁸

Peter, 40, is an academic and now lives alone. He has no children, nor does he have direct contact with any. He was arrested for engaging in sexual communication with a child online, including sending explicit images of himself and requesting self-generated sexual images from a child. Following his arrest, the police provided him with Lucy Faithfull Foundation's Stop It Now! helpline details and he has had regular contact with the helpline over several months.

During his calls, Peter spoke about his poor mental health over a number of years, including anxiety, depression and self-harm. He explained that he had begun viewing legal adult pornography online about 10 years ago, and that this behaviour had escalated quickly to sexual chat with adults and then sexual communication with children of varying ages, mostly pubescent girls.

Peter disclosed that he had been engaging in such conversations with children for the last five years and that the severity and frequency of his online behaviour had escalated during lockdown. He believes this was, at least in part, due to him being inactive and feeling isolated.

- Evidence shows that excessive consumption of legal adult pornography can result in offenders viewing illegal child sexual abuse material. As increasingly extreme pornography becomes available on mainstream sites – including pornography which

¹¹ https://www.police-foundation.org.uk/2017/wp-content/uploads/2022/07/turning_the_tide_FINAL-.pdf

¹² <https://www.pornhub.com/insights/yir-2021>

¹³ https://cease.org.uk/wp-content/uploads/2021/07/210607_CEASE_Expose_Big_Porn_Report.pdf

¹⁴ <https://academic.oup.com/bjc/article/61/5/1243/6208896>

¹⁵ <https://academic.oup.com/bjc/article/61/5/1243/6208896>

¹⁶ <https://academic.oup.com/bjc/article/61/5/1243/6208896>

¹⁷ <https://www.iicsa.org.uk/key-documents/28604/view/INQ006736.pdf>

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https://www.lucyfaithfull.org.uk/files/LFF_Annual_Report_2020_2021.pdf?utm_source=lucyfaithfull.org.uk&utm_medium=referral&utm_campaign=Annual-report-20-21

depicts sexual activity with 'child-like' performers – the threshold of what is 'acceptable' is lowered, legitimising further deviant behaviour.¹⁹ The user may also 'spiral' seeking more and more extreme pornography to fulfil them, resulting in seeking illegal child sexual abuse material.²⁰

- For some adults, consuming extreme pornography can act as a gateway to illegal child sexual abuse material, and potential abuse of children online and offline.
- Chief Constable Simon Bailey told the Independent Inquiry into Child Sexual Abuse that 'creating a group of men who will look at pornography and the pornography gets harder and harder and harder, to the point where they are simply getting no sexual stimulation from it at all, so the next click is child abuse imagery. This is a real problem'.²¹
- The Lucy Faithfull Foundation, a UK-wide charity dedicated to the prevention of child sexual abuse, have warned that what they are seeing 'on a daily basis is the conflation of easy access to hardcore and deviant pornography and an interest in child molestation. The link is unambiguous'.²² Their data shows that the consumption of online legal adult pornography increased during the pandemic. This increase led to some people to look for 'riskier' material and begin viewing child sexual abuse material. In addition, contact with the Stop It Now! Helpline and online self-help modules to stop viewing sexual images of children also increased by 107%.²³
- Interviews with offenders who viewed child sexual abuse material in the UK indicate that most had not intentionally sought out child sexual abuse material, but it was the result of 'entrenched pornography use' and spiralling online behaviour.²⁴ Their initial engagement with child sexual abuse material was often incidental rather than purposeful, and nine out of ten offenders said that they initially found child sexual abuse material through online pop-ups and linked material.²⁵
- The largest every survey on the thoughts and behaviours of people who watched child sexual abuse material online has found significant evidence that those who watch illegal material are at high risk of going on to contact or abuse a child directly.²⁶
- Almost half (42%) of respondents to the survey said that they had sought direct contact with children through online platforms after viewing child sexual abuse material, and 58% reported feeling afraid that viewing child sexual abuse material might lead them to committing abuse in person.²⁷
- As well as the impact on adults, pornographic content that depicts sexual activity with 'child-like' performers or between step-family members can impact children. As long as harmful, abusive content remains online, children will be able to access it. Children like Elizabeth,²⁸ a 15-year-old girl supported by Barnardo's who has been sexually abused by a much older relative for a number of years. Elizabeth turned to pornography to try and understand her own sexual abuse, however the content she

¹⁹ https://www.theguardian.com/global-development/2020/dec/15/how-extreme-porn-has-become-a-gateway-drug-into-child-abuse?fbclid=IwAR0JjqKIZxs6xyyV8ZzYyPmoYKZTpiJF8d_cdDGdHww1IaVqxWTLmZTu5wU%3e

²⁰ <https://www.irishexaminer.com/news/arid-20036653.html>

²¹ <https://www.iicsa.org.uk/reports-recommendations/publications/inquiry/final-report>

²² <https://www.theguardian.com/global-development/2020/dec/15/how-extreme-porn-has-become-a-gateway-drug-into-child-abuse>

²³ <https://www.lucyfaithfull.org.uk/featured-news/isolation-unemployment-and-escalating-pornography-habits-contribute-to-a-record-rise-in-people-seeking-help-to-stop-viewing-sexual-images-of-children.htm>

²⁴ https://www.police-foundation.org.uk/2017/wp-content/uploads/2022/07/turning_the_tide_FINAL-.pdf

²⁵ <https://www.iwf.org.uk/news-media/news/new-research-shows-action-needed-to-stop-people-seeing-indecent-images-of-children-for-the-first-time/>

²⁶ <https://tsjournal.org/index.php/jots/article/view/29>

²⁷ <https://tsjournal.org/index.php/jots/article/view/29>

²⁸ Please note all names have been changed.

found on pornography sites depicted older relatives having sex with young girls and the girls enjoying it. It wasn't until she disclosed her abuse that she realised that it was not normal.

- YouGov polling for Barnardo's found that almost 70 per cent of UK adults (69%) agree that pornography which would be illegal on DVD should also be illegal online.²⁹
- The Online Safety Bill should address this parity between offline and online standards and protect children by preventing content from being uploaded online if it would fail to attain an R18 certification and contains prohibited content.

Case Study from Lucy Faithfull Foundation³⁰

Hector, 38, is married with three children and works full time in the finance industry. He was recently arrested for having accessed sexual images of children online. After his arrest, Hector attempted suicide and was admitted to a psychiatric hospital for a short period.

He contacted Lucy Faithfull Foundation's Stop It Now! helpline for advice and support after being given their details by the police. Hector told the helpline that his childhood had included many damaging experiences including sexual abuse within the family, early exposure to adult pornography and neglect. He told the helpline that as an adult, he would binge watch pornography and "lose time" accessing sexual content online. He referred to this behaviour as "an addiction".

Hector said he had made many attempts to desist in his illegal online behaviour, but all eventually ended in failure. He stated he didn't know how to stop and stay stopped.

Suggested questions:

1. What reassurance can the Government provide to Barnardo's, CEASE, and other charities that age verification to prevent children accessing pornographic content will be robustly, effectively and swiftly implemented?
2. Does the Government agree with Barnardo's that age verification must be implemented as soon as possible, and would she support a time limit of six months to enforce pornography platforms to introduce it at the earliest opportunity?
3. What consideration has the Minister given to ensuring that pornographic sites remove content that promotes a sexual interest in children, ensuring a parity between online and offline standards?
4. Whether the Ministers shares the concerns of Barnardo's, CEASE, and other organisations that continued access to legal pornographic content online, which depicts sexual activity with children, is extremely harmful to children?

About Barnardo's

Barnardo's is the UK's largest national children's charity. In 2021/22, we reached 357,276 children, young people, parents and carers through our 794 services and partnerships across the UK. Our goal is to achieve better outcomes for more children. To achieve this, we work with partners to build stronger families, safer childhoods and positive futures.

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²⁹ <https://www.barnardos.org.uk/news/almost-70-uk-adults-support-tighter-controls-online-pornography-content>

³⁰

https://www.lucyfaithfull.org.uk/files/LFF_Annual_Report_2020_2021.pdf?utm_source=lucyfaithfull.org.uk&utm_medium=referral&utm_campaign=Annual-report-20-21