



OFCOM Consultation Report

(Consultation Event – January 30th 2024)

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1. Background

- 1.1. The NWG Network held an online consultation event, with support from the Child Sexual Abuse Policy Team in the Online Safety Group at the Office of Communications (OFCOM)¹.
- 1.2. This event was in response to the OFCOM illegal harms consultation and sought to contribute to the extensive evidence gathered from industry and other experts in the sector. The consultation covered:
 - 1.2.1. The causes and impacts of illegal harms.
 - 1.2.2. How services should assess and mitigate the risks of illegal harms.
 - 1.2.3. How services can identify illegal content; and
 - 1.2.4. Our approach to enforcement.

2. The Event

- 2.1. On January 30th 2024 the NWG hosted a workshop, with the support of Ofcom, to collect evidence and views from frontline practitioners. The event began with Ofcom presenting the consultation and its scope in detail covering a range of illegal harms listed in the legislation. It was intended that this event should in particular focus on **CSA (child sexual abuse)**, and in particular **grooming**.
- 2.2. The event was attended by in excess of 70 delegates from a range of statutory and third sector organisations. Delegates were invited to contribute to breakout groups to consider and discuss four questions. Each of the five breakout rooms were facilitated by a member of the NWG who in turn were supported by a member of OFCOM staff¹. The questions were set to elicit the practitioner's experience of working with young people who have been victims and survivors of, for example, online grooming, online sexual abuse or harassment. The aim was to create debate that would cover broad topics regarding the impact felt by children, vulnerability on the internet and supporting children to live safer lives online.
- 2.3. The breakout sessions were recorded and the transcribed notes from the session collated to inform this report. Practitioners are not named in this response and where required details about individuals and young people have been anonymised. It is acknowledged that there are overlaps in responses to the various questions.

¹ The presence of the OFCOM staff was simply to observe and assist the NWG with any technical questions regarding the subject matter. The discussions and subsequent views obtained were led by the NWG.

2.4. The questions posed were as follows,

- 2.4.1. How do perpetrators target children and young people online?
- 2.4.2. What factors, both online and offline make children vulnerable to being groomed online.
- 2.4.3. What are the long-term impacts of online grooming on children and families that you work with?
- 2.4.4. What does best practice in keeping children safe online look like?

The Responses

3. How do perpetrators target children and young people online?

- 3.1. During the consultation process, it was agreed that online abuse while not a new phenomenon would benefit from more research especially in relation to virtual abuse, to better understand how perpetrators target children and young people online. It was accepted that we need to understand more about how perpetrators operate online and how they target vulnerability. It was also accepted that a wide range of mediums exist including social media and gaming and that these are constantly evolving which makes it challenging for practitioners to keep track of.
- 3.2. It was felt that perpetrators are using a scatter gun approach to contact children and young people online and therefore target those who respond quickly, as it was felt that grooming can happen quicker online than off-line.
- 3.3. There is a normalisation of increasing contacts with friends of friends, so perpetrators exploit this by presenting as associates, therefore, young people do not really know who they are engaging with. Snapchat, for example, creates a sense of safety for young people. There is concern regarding Discord and other similar platforms ability to 'quick add' friends as algorithms used within social media can steer perpetrators towards young people.
- 3.4. It was suggested that more work with tech companies is needed for them as service providers to understand perpetrator behaviours and be able to tackle online abuse more effectively. Application designers and platforms need to understand the risks children and young people face online and how multi layered they are.
- 3.5. It was considered that there is a need to stop chasing individual applications and instead focus more on why children use them, what purpose they serve as well as understanding what needs they meet for young people. Snap chat was mentioned often during the consultation process but there was consensus that children use multiple platforms/apps and focussing on one isn't helpful.

- 3.6. A discussion focussed on how perpetrators establish initial contact. It was felt that's achieved via a wide range of platforms, often through connections, by sending random direct messages. Contact is established by strangers often commenting on the child's appearance. Young people want to grow their social media presence/following sometimes to promote their accounts/careers and so are susceptible to blackmail and bribery. Fake accounts are created by perpetrators to establish contact by subtle grooming over a period of time. Contact is established on open platforms moving conversations to E2E platforms which increases risk. It was agreed that there is a crossover of online and offline abuse, contact rarely stays in one space or the other and offline can lead to sharing of images and online can lead to contact abuse. Perpetrators seek to move conversations from public to private spaces online quickly which further increases risk. Concerns were raised about the increase in sites advertised as teen chat sites. Clearly this is a provider marketing to a target audience however equally signposting perpetrators.
- 3.7. The consultation acknowledged that Artificial Intelligence (AI) can be useful for preventing and identifying perpetrators but also poses a significant risk as perpetrators can use AI for multiple grooming activities. Concerns were raised about girls describing themselves as sex workers and content creators thus becoming vulnerable to opportunities for earning money on platforms such as Only Fans due to the monetizing of sexual content.
- 3.8. Gaming was discussed and how gaming platforms are used by perpetrators to groom children and young people, including through the use of gifts, cheats and rewards. Concerns were raised about the fact that gaming platforms are part of children and young people's normal interactions. Gaming is much bigger as there are more diverse accessible gaming platforms. It was acknowledged that Gaming has and continues to be used by perpetrators to radicalise people and there are opportunities to learn from this. There are also cases of adult family members being targeted through the world of gaming to then access children and young people and this needs to be considered and understood more.
- 3.9. Consultation focussed on the need for a prevention model at an earlier age and the need for this to be embedded in families, including preventative education. It was accepted that we need to teach children and young people how to identify and manage risks online and improve messages about e-safety lessons in schools, look at what's influencing harmful sexual behaviour and explore misogynistic views that are being perpetrated and reinforced as rape culture is being increasingly reinforced at an early age.
- 3.10. Parents and education settings need to play a major role in this, but parents and teachers need to feel confident in their own understanding of challenging online risks. Parents/carers need to be confident about setting safety defaults in apps to safeguard children and young people. It was suggested that this could be done in community groups/schools through a preventative, collaborative and contextual safeguarding approach, working with parents rather than 'doing to'.

- 3.11. Further discussion focussed on how we decrease stigma for families and increase knowledge gaps around online, recognising the need for practitioners to include online in safety planning with families.
- 3.12. An example was shared of an area using drop ins as a space for families to early identify risks and harms and discuss concerns such as,
- 3.12.1. Are we having the right conversations with children and is what they're being taught in school landing?
- 3.12.2. Are we asking children what do you want and how they want to learn?
- 3.13. The need to support parents was highlighted, as they go through the same traumas as their children but with little support; *"I'd one young person recently said to me, how do I cope with my mum going to her bedroom at night and crying her eyes out because I can hear her through the wall and I 'caused that"*.
- 3.14. There was recognition of the need to upskill professionals due to feeling ill equipped to understand tech language and platforms, including the ability to detect certain terms used in chats to identify abuse. Professionals do not know what to do online, are overwhelmed and this plays out in their lack of support for parents. Professionals struggle to keep up with the speed of new technology and we need to have more conversations with children about the fact that what's posted online isn't always correct or accurate. Children tend to post the best version of themselves online especially on social media.
- 3.15. There was an acknowledgement of the need for more training and awareness for CPS prosecutors, the Judiciary and potential jurors to build confidence in the criminal justice system.
- 3.16. There is concern about the lack of effective systems in place to protect children from being approached, which includes current age verification systems not being satisfactory (concerns about images of children getting younger and younger), parental controls being breached. Practitioners raised concerns about the inconsistency in terms of response from police in particular.
- 3.17. Concerns were raised about children reaching 18 years of age and support dropping off which highlighted the need for transitional safeguarding and services being made available up to the age of 25. Using the language of recovery and getting this terminology embedded across all sectors was highlighted as important as was the need to understand and respond to the long-term health impacts of online abuse. It was acknowledged that abuse online is still abuse and may have a lifetime impact on a young person though to adulthood that may affect their full potential. There is concern that this is not widely recognised by practitioners and can sometimes be misperceived as less harmful.
- 3.18. There was a clear need acknowledged for an online risk assessment model.

4. What factors, both online and offline make children vulnerable to being groomed online.

- 4.1. The consensus was that children, by virtue of their age, are very impressionable and vulnerable due to peer pressures, the need to be liked and to 'fit in'. When a child is disabled and or has additional neurodiverse needs relating to their cognition and communication their vulnerabilities are exaggerated. It was repeated often with the discussions the proliferation of the onus largely being upon the Child and/or his family to keep the child safe which only serves to increase the child's vulnerability.
- 4.2. Discussions focussed on the vulnerabilities of children and young people and recognition that bullying, alienation and neurodivergent needs can result in young people being more easily targeted by perpetrators online. Concerns regarding isolation relates more to children in rural communities, the online world is their connection to the outside world so this can be very difficult for young people. There is a risk that algorithms send children to negative influencing websites i.e. extremism or eating disorder websites, so pull and push factors of algorithms need to be considered and parents need to know how algorithms work and how they target children.
- 4.3. The key to this is understanding adolescent development and knowing how to protect children and young people without victim blaming and to avoid criminalising young people for crimes committed by perpetrators or as a consequence of abuse and exploitation. Concerns were raised about practitioner training on assessing online risks and then working with children affected by abuse, for example, a practitioner talking to children about e-safety after they have been abused could be perceived as victim blaming.
- 4.4. There is evidence of victim blaming language and victim blaming behaviour from professionals working in this space. Online offences do not carry the same media attention as a child stabbing for example raising concerns about a hierarchy of offending that the public will tolerate but often little discussion about CSA offending.
- 4.5. The discussions identified what was felt to be three main types of 'isolation',
 - 4.5.1. *Disconnection from family and community.* When a child has been moved away due to fleeing abuse or placed in care out of area. Exclusion from education. Post pandemic children wanting to find a both sense of belonging they've missed out on social skills and therefore they'll find a group of peers or friends which will give them a lot of influence.
 - 4.5.2. *Aloneness,* lack of attention at home due to busy parents. Neurodiversity of Children and Young People (CYP). Minoritised communities such as SEND, LGBT+ and those with English as second Language seeking a sense of belonging.

The risk of algorithms sending children to negative influencing websites i.e. extremism or eating disorder websites. Experiences from being bullied can lead to a child becoming very 'reclusive'.

- 4.5.3. *Environment*: Children living in rural communities, the online world is their connection to the outside world. This can become even more significant in children with neurodiverse needs where the online world is a space where they are able to communicate and interact easier.
- 4.6. The discussion also considered what was generally termed Safeguarding 'issues' such as young people that experience domestic abuse (directly or vicariously through living with DA), neglect, emotional or physical abuse. It was felt (subject to not blaming parents) that it perhaps led to less parental scrutiny and therefore less appropriate boundaries with internet use by parents. Exposure to online harm may be linked to or an extension of existing intrafamilial abuse which potentially leads to a lack of understanding in what is safe and unsafe.
- 4.7. Discussions considered the frustration that a lack of technical /exploitation knowledge can have on a parent or carers 'curiosity', for many adults their 'know how' comes from their children. In many cases it was felt that the chronological age of a child could be at odds with their cognition or capacity to understand messages and approaches that are complex and potentially threatening. This parental frustration can lead to relationship breakdown where a breach of trust is felt by the child when the parent becomes overly invasive/suspicious of their online activities.
- 4.8. Financial difficulties were felt to be a big factor in vulnerability creation. The 'cost of living crisis' is seeing children pressured to feel like they want to help with household income or want some financial independence. This creates a vulnerability that is well recognised and targeted by organised criminality.
- 4.9. Another factor often missed by practitioners and managers are those children struggling with transition into adulthood. This can result in changing relationships with family members and indeed professionals withdrawing from support due to a child age rather than reduced vulnerability. This loss of support via trusted adults or peers creates a void, again. Targeted by criminality.
- 4.10. It was discussed that some young people feel the online space is a much safer place than offline to experiment with their views regarding sexuality and gender. They can be who or whatever they want to be without judgement and/or with anonymity. However, perpetrators are skilled at targeting their grooming towards these vulnerabilities and either exploiting them to create relationships or as leverage to conduct criminal or sexual acts.

4.11. Lastly within this question the group discussed the perception or belief that more could be done at school to educate against the risks online. It was accepted that there is a great deal of competition for non-curriculum subject matter to be delivered with PSHE or similar timetable space but perhaps more focus of the risks in streamlined lessons dedicated to computing could be a consideration.

5. What are the long-term impacts of online grooming on children and families you work with?

- 5.1. This question attracted a passionate debate from practitioners who were only too aware of the legacy implications that trauma from abuse creates. The debate highlighted that online grooming can inflict significant psychological damage on children, leading to long-term trauma and affecting their future development and life opportunities.
- 5.2. The potential legal implications of online grooming, such as the involvement in criminal activities or the sending of indecent images, can have a lasting impact on a child's future in cases where, as a result of the abuse, they are criminalised within the justice system.
- 5.3. Delegates agreed that the existing laws relating to the distribution of indecent images of children is out of touch and outdated and may not adequately address the complexities of modern digital communications. The current legal framework can criminalise young people for sharing images due to coercion and manipulation.
- 5.4. Discussions highlighted the need for a more nuanced approach to addressing harmful sexual behaviour while distinguishing it from consensual or normative image sharing. It was felt to be crucial to improving messaging to young people about the risks of engaging in certain online behaviours, such as sending explicit images or engaging in video calls without understanding the potential for exploitation or misuse of their content.
- 5.5. Education, informed support, and improved messaging around the harm of sending and receiving indecent images are essential. Resources from organisations like NWG, Childline, Local Authorities, Marie Collins Foundation, The Lucy Faithfull Foundation, and the NSPCC play a key role in providing assistance and guidance to affected children and families. Furthermore, the transition from online grooming to offline sexual abuse underscores the urgency of addressing these issues comprehensively.
- 5.6. Similar to the previous question, the debate found it to be imperative that education initiatives are enhanced or developed, particularly in Personal, Social, Health, and Economic (PSHE) education, to equip children with the knowledge and awareness necessary to navigate emerging online threats and understand the importance of consent.

6. What does best practice in keeping children safe online look like?

- 6.1. The group emphasised the need to include online as part of the child's world and a shift in the narrative away from a binary approach of online/offline. This would then open up conversations much earlier about the child's engagement online and enable possible earlier identification of abuse.
- 6.2. Discussions led to a call for a multi-agency approach and bringing in a range of partners in the safeguarding response *but* for this to be resourced to meet the need. By this it was suggested that we consider wider partnerships with the expertise to progress solutions and not just the usual statutory partners.
- 6.3. Work completed in schools through PSHE was valued but more appropriate messaging at different ages was needed. More resources and discussions were considered as a need for older teenagers so that it was relevant for them.
- 6.4. Targeted youth work was considered a positive way to engage with young people around online harms and create safer spaces for young people to be able to talk openly. An area in particular that central government should consider especially in light of reduced funding in this particular sector.
- 6.5. Discussions yet again centred around enabling and empowering parents and carers to feel confident and skilled in setting boundaries around online use. It was accepted that how, where this is offered and take up can be a challenge. The debate acknowledged that many parents as well as practitioners felt underequipped and had a lack of understanding and confidence around this so practical support from trusted professionals as well as resources were needed.
- 6.6. Practical suggestions to improve digital platforms included creating a feedback loop for when young people report abuse online, introducing meaningful age verification and having a consistent clear reporting path that is easy to find across all platforms. The group highlighted that end to end encryption already provides ongoing challenges for the workforce and where this is rolled out further it will only serve to hamper child protection efforts further.
- 6.7. Gaming was also an area identified where more work was required to really understand the risks and for it be clearly incorporated into discussions around online harm nationally. Framing the conversations around protection and safeguarding of children was central to discussions and policy going forward. It is about how we have a duty to protect our children and safeguard our children now and for those generations to come in the future.

- 6.8. The group advised that Consultations like this should include the voice of children and families to understand and share what works well and what needs to be done. The group raised the need to focus on platforms that facilitate perpetration as much as individual perpetrators.
- 6.9. Like previous answers above it was highlighted that there is currently an onus on the child to report and disclose. This can be very challenging for young people as they may experience fear that, for example, images might resurface and may even avoid online spaces entirely.
- 6.10. The consultation recognised that online child sexual abuse has massive, lifelong impacts both for the child and their family. Acting in a child-centred, non-judgemental, trauma informed way that does not retraumatise children was identified by many. Positive and effective relational working with young people, including the ability to build trust and rapport with young people was paramount. There was an acknowledgement in the consultation that many professionals didn't feel confident in this area of work or that further support might be needed such as specialised therapy but this had to be based on individual needs of the family.
- 6.11. The consultation was strong regarding the need to 'work with' families rather than them feeling they are being 'done to' where they are struggling to understand and respond to what was happening to their child. One practitioner said *"it's trying not to overwhelm families, isn't it? With professionals, sometimes that's done with good intention and ... different families will need different things. It's not a one size fits all"*.
- 6.12. The consultation highlighted that parents/carers often blame themselves for what happens to their child but there was a danger of this blame was also cemented by practitioners and or interventions and training. Therefore the language we use to talk about, write about and use with families is important as well helping families to process what has happened. This may also include being able to challenge others when inappropriate language is used.
- 6.13. Lots of discussion in the consultation focussed on how to best support children and their families to recover from online harm versus the anxiety about reintroducing young people safely back online if they wished to do so. There was a recognition of the complexity to balance this but not to isolate young people further. A trauma-informed approach to understand that online harm does not define the person, shouldn't limit them or their opportunity to succeed but focussed on achieving best outcomes was suggested.

6.14. In order to support families, the consultation clearly identified the need to upskill and train practitioners in this area. Resources, ideally co-produced with young people and training were needed to give workers knowledge, skills and confidence and for this to be embedded in workforce development and CPD. In addition, it was also important to recognise the limitations of individual roles and to know where to go for further support and advice.

6.15. The consultation also highlighted the impact of vicarious trauma on practitioners as they support children and families and the need to promote good quality training support and supervision for staff around this as there was a real risk of compassion fatigue for staff. Looking after and investing in the workforce and having opportunities to share better practice will support and inform our responses to online harm and better prepare and support children and families.

7. Summary

7.1. The event was well attended and as a piece of consultation the experiences and professional input from practitioners provided a great deal of qualitative insight. Without becoming repetitive there were cross over themes and concerns that resonated across the four questions that have been highlighted below.

7.2. More understanding is required, and interventions informed by what we know to be the barriers children and young people face as a result of cultural, religious, social, and psychological factors. We know in the offline world a great deal of thought and practise centres around safe and supportive environments for children yet more needs to be done to provide this in the online world.

7.3. We know when children feel safe and empowered to disclose abuse and seek support they do. Mandatory reporting frameworks should consider where responsibilities in the online world might sit. Undoing victim-blaming myths, providing assurance of belief and support, and doing away with harmful perceptions surrounding disclosure are vital steps toward creating an environment conducive to reporting abuse. Other barriers especially for children from marginalised communities including ethnic minorities, LGBT and SEND include not having the language to describe what happened.

7.4. It was also recognised that reductions through improved prevention work, early help and intervention not only have the potential to reduce trauma and improve future life opportunities for young people but has the potential to reduce demand in adult services and support from demands on GPs, primary and secondary health care, policing and the economic demands we see as a result of the long term effects on children.

- 7.5. There is concern about the lack of effective systems in place to protect children from being approached, which includes current age verification systems not being satisfactory (concerns about images of children getting younger and younger), parental controls being breached. Practitioners raised concerns about the inconsistency in terms of response from police in particular.
- 7.6. The consultation acknowledged that Artificial Intelligence (AI) seemed to be the next potential risk and how this was even less well understood by practitioners both in terms of what it will create and where in the online world of a child it could manifest.