

Scale OF Harm

RESEARCH METHOD, FINDINGS, AND RECOMMENDATIONS

Estimating the Prevalence of Trafficking
to Produce Child Sexual Exploitation Material
in the Philippines

SEPTEMBER 2023



IJM



University of
Nottingham
Rights Lab

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Acknowledgements



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Foreword

There are just some words that should never go together in a sentence:

livestreamed child sexual abuse

child sexual exploitation material

The thought is enough to make honest people cringe. Every one of us has been a child. We know the vulnerability of children, especially young children—children like *Jolene.

She's like many 6-year-old girls, maybe like you when you were six. She lives with her mom in a small house. She loves cake and wearing dresses. And like many 6-year-olds today, she's spent much of her life behind a mask to protect her from COVID.

But while being behind a mask protected her health, **being placed in front of a camera took it away.**

You see, Jolene was not safe—not at home, not with her mom, and not in the videos and photos sold online to men hungry to consume her abuse.

Jolene is just one.

1 of over 1,100 Filipinos brought to safety from this violence.

Today, she is safe and her perpetrators are arrested.

But Jolene is just one.

1 of the nearly **half a million Filipino children** sexually abused and exploited in person by adults to create images, videos, and livestreams for sale to offenders around the world.

In 2022 alone.

The *Scale of Harm* study and this report is about those children, and how together we must protect them.

Now.

John Tanagho

Executive Director,

International Justice Mission's Center to End Online Sexual Exploitation of Children

Partner Reflections

“Alarming findings from the new IJM *Scale of Harm* survey reveal that nearly half a million children in the Philippines have been trafficked to produce child sexual exploitation material, often by relatives or people they know. However, this issue transcends borders: where we look for these crimes, we uncover them, and once these abusive images and videos are online, they can be accessed and shared by perpetrators all over the world. Responses to this threat must therefore be global, coordinated, and guided by both evidence and the voices of survivors, just as this study’s recommendations have been.”

Iain Drennan, Executive Director, WeProtect Global Alliance

“The Australian Institute of Criminology has been pleased to support International Justice Mission’s *Scale of Harm* project as a member of the initiative’s External Advisory Council. Through our own work, we have recognised the harm caused to children in the Philippines by perpetrators who purchase livestreamed child sexual abuse. This project has helped to clarify the extent of that harm, using robust scientific methods to generate an understanding of the problem that has not previously been possible. We believe this study will help to drive further action to protect future generations of children from experiencing online sexual exploitation.”

Dr. Rick Brown, Deputy Director, Australian Institute of Criminology

“IJM’s Scale of Harm provides alarming insights into the magnitude of child sexual exploitation in the Philippines, especially the prevalence of live streaming, on demand child sexual exploitation and child sex traffickers exploiting victims to produce child sexual abuse imagery. Every day, the National Center for Missing & Exploited Children provides thousands of CyberTipline reports to the Philippine National Police regarding child sexual exploitation. We strongly support IJM’s Scale of Harm key recommendations to better protect children.”

John Shehan, Senior Vice President, Exploited Children Division & International Engagement, National Center for Missing & Exploited Children

“Western Union vigorously condemns crimes of this nature, and we devote significant resources to help detect and deter the misuse of our services. In addition to supporting industry efforts such as this work with IJM, we are constantly adapting and evolving our systems and collaboration efforts to enable a more sophisticated level of detection and deterrence against illegal activity. Key findings from this report help inform and reconfirm the need for Western Union’s robust anti-human trafficking measures. To this degree, we appreciate the opportunity to participate in this research, and together with our partners, collaborate to protect our communities and our global financial system.”

Western Union

“Being a member of the External Advisory Council (EAC) for *Scale of Harm* has allowed us at Quantum to share our data, analytics and financial industry knowledge to help drive for impact on raising awareness and help drive the right strategies in combating CSEM. Being able to partner with IJM, University of Nottingham Rights Lab and other EAC members has been a great experience and we are very privileged to do so. We are very thankful for this opportunity and look forward to seeing the great work this will enable going forward.”

Alistair Knox, Lead Analyst, Global Markets & Tatia Rashid, Executive Manager, Quantum

"I believe that to develop an effective solution, we need to know how big the problem is. Hence, in attempting to protect the Filipino children from trafficking to produce CSEM, we need to know how prevalent it is in every part of the Philippines so we can strategize and plan better. I also believe that what makes *Scale of Harm* even more important is that we get to know the factors which drive online sex offenders and traffickers to abuse children. The study also gives us at least an idea of who are the usual traffickers of children to produce CSEM, and the common signs and behavior which indicate people might be doing this crime at their homes.

In my opinion as a survivor leader, we should derive a preventive concept or a system of protecting children based on the *Scale of Harm* results with an adaptable design and collaborate with the government and non-government organizations in implementing it. I think it is also important for trafficking of children to produce CSEM to be heard more. We should raise people's awareness about the nature of the crime itself and the consequences, not only to prevent more victims but also to be a tool in sending a message to the abusers to stop doing what they do. Provide spaces and platforms for survivor leaders to lead in spreading awareness about it and think of creative ways in which talking about trafficking of children to produce CSEM would not be hard for many, especially within the family. It could also be a way in removing the existing idea that talking about it is a taboo in Filipino communities."

Ruby (a pseudonym), Survivor Leader

"For me this study is important because our voices will be heard, and this form of online sexual exploitation will be known to other people for them to have awareness that the experience of survivors isn't easy."

Joy (a pseudonym), Survivor Leader

"It is important that our voices are being heard. What is here is true and real. It will also make the audience feel convicted. It means a lot that this study was intentional to include survivor voice."

Liberty (a pseudonym), Survivor Leader

Key Definitions

Trafficking of Children to Produce Child Sexual Exploitation Material

In this form of online exploitation in the Philippines, offenders typically in Western countries pay adult traffickers to livestream the sexual abuse of children in real time, and/or to produce new child sexual exploitation material (CSEM) such as images and videos.

Child Sexual Exploitation Material (CSEM)

Any visual or audio (and/or any combination thereof) representation of children (under the age of 18) engaged in sexual activity or of minors engaging in lewd or erotic behavior recorded, produced and/or published to arouse the viewer's sexual interest. Child sexual abuse material (CSAM), which depicts the contact sexual abuse of a child, is a subset of CSEM. This report will use CSEM as a broad, umbrella term.

CyberTipline Report

Reports received by the National Center for Missing & Exploited Children (NCMEC) from the public and Electronic Service Providers (ESPs) related to child sexual exploitation. NCMEC makes CyberTipline reports available to law enforcement agencies around the world as appropriate, based on apparent jurisdiction related to the reported incident.

Livestreaming of Child Sexual Abuse

Children are forced to perform sex acts on themselves or each other, are abused by an adult or are exploited in other violent ways. This child sexual abuse material is transmitted to a viewer/s in real time through live video calls while the offender watches, engages, and even directs the abuse while it is occurring.

Demand-Side Offender (DSO)

A person based in a demand-side country (such as the US, UK, Australia, or EU) who provides financial compensation to a trafficker producing child sexual exploitation material including via livestreaming in a source-side country (such as the Philippines) for any form of CSEM or in-person sexual exploitation of children. In cases of trafficking to produce child sexual exploitation material, DSOs often actively participate in the sexual abuse of children by dictating the child's abuse in advance and/or directing abuse as it occurs via livestream (see livestreaming definition above). DSOs can also produce CSEM when they record sexual abuse remotely and when they entice, solicit, or coerce minors to create CSEM.

Trafficker

A person who sexually abuses or exploits a child through the means of the internet to produce and offer for sale new CSEM, including via livestreaming, in exchange for compensation. According to Philippine Law (Republic Act 10364),¹ this facilitation is a trafficking offense.

Introduction

Worldwide, the threat to children of being sexually abused in real-time has grown as “live-streaming of child sexual exploitation for payment has seen an increase in recent years,” according to INTERPOL,² Europol³ and the WeProtect Global Alliance⁴ concur. While the Philippines is a global epicenter, other countries have cases of children sexually abused by adults who sell live video and other child sexual exploitation material.⁵

Unfortunately, global tech platforms remain fertile ground for this abuse, with Australia’s eSafety Commissioner reporting in December 2022 on platforms that “are neither taking action to detect CSEA [child sexual exploitation and abuse] in livestreams ... or taking action to detect CSEA in video calls or conferences.”⁶

Zooming out, in 2022, the U.S. based National Center for Missing & Exploited Children (NCMEC) received more than 32 million reports of suspected child sexual exploitation, with 99% submitted by Electronic Service Providers (ESPs) to the CyberTipline. Those reports contained 49.4 million images, 18.8 million (38%) of which were unique images. Of the 37.7 million videos reported, 8.3 million (22%) were unique.⁷ In 2022, the Philippines received a staggering 2.5 million CyberTipline reports. NCMEC reports reflect the broader global problem of child sexual exploitation material production, sharing, and viewing, but not necessarily livestreaming as those incidents are not routinely detected and reported. Due to uneven detection and reporting across tech companies, the world does not actually know how many children globally are sexually abused to produce CSEM, or how many such live videos, recorded videos, or images of child sexual abuse and exploitation are produced and shared online.

Turning to the Philippines, the *Disrupting Harm* study by UNICEF, ECPAT International, and INTERPOL provided data insights, estimating that at least 2 million children in the Philippines experienced online sexual exploitation and abuse in 2021. *Disrupting Harm* surveyed a much broader set of online abuse than *Scale of Harm*, including children being blackmailed to engage in sexual activities, someone sharing their sexual images without permission, or being coerced to engage in sexual activities through promises of money or gifts.⁸

Uniquely, *Scale of Harm* set out to determine the prevalence of a specific form of child sexual abuse online: in person sexual abuse of children by adults in the Philippines while foreign offenders watch and direct the abuse in real-time for a fee and receive newly produced images and videos. *Scale of Harm* data indicates that the prevalence of trafficking of children to produce CSEM in the Philippines is vast and alarming.

Scale of Harm Overview

With this backdrop, in 2021 International Justice Mission (IJM), together with the University of Nottingham Rights Lab, a world-leading human trafficking research institution, launched the *Scale of Harm* project to develop and implement a mixed-methodology providing prevalence estimates of trafficking of children to produce CSEM, including via livestreaming, in the Philippines.

A prevalence estimate is critical to determine the protective impact of government and multi-stakeholder efforts over time. After all, successful child protection interventions should lead to fewer children being harmed in the first place. Prior externally validated IJM prevalence studies⁹ on various forms of violence have proven that increased perpetrator accountability through detection, arrest, and prosecution can have a disproportionate impact on reducing crime within the context of a trauma-informed, holistic justice system and societal response. For example, studies showed between 72% to 86% reductions of in person child sex trafficking in commercial establishments in Philippine regions.¹⁰

Prevalence estimates are crucial to ascertain if multi-stakeholder efforts are working to accomplish the most important goal, namely, protecting more children from child sexual abuse and exploitation in the first place (i.e., prevention).

The *Scale of Harm* study consisted of two components: developing the world’s first prevalence research methodology for trafficking of children to produce CSEM and implementing the designed methodology to estimate prevalence.

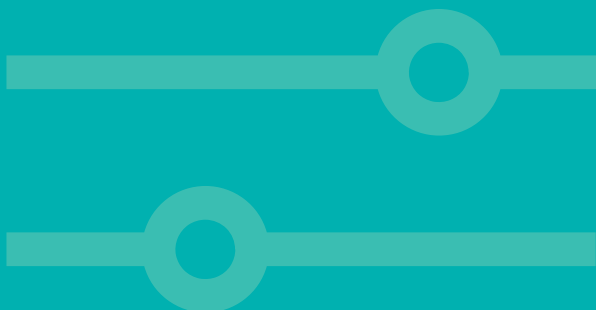




Stock Photo. Not an actual survivor.

SCALE OF HARM

Methodology



Methodology

Methodology Development

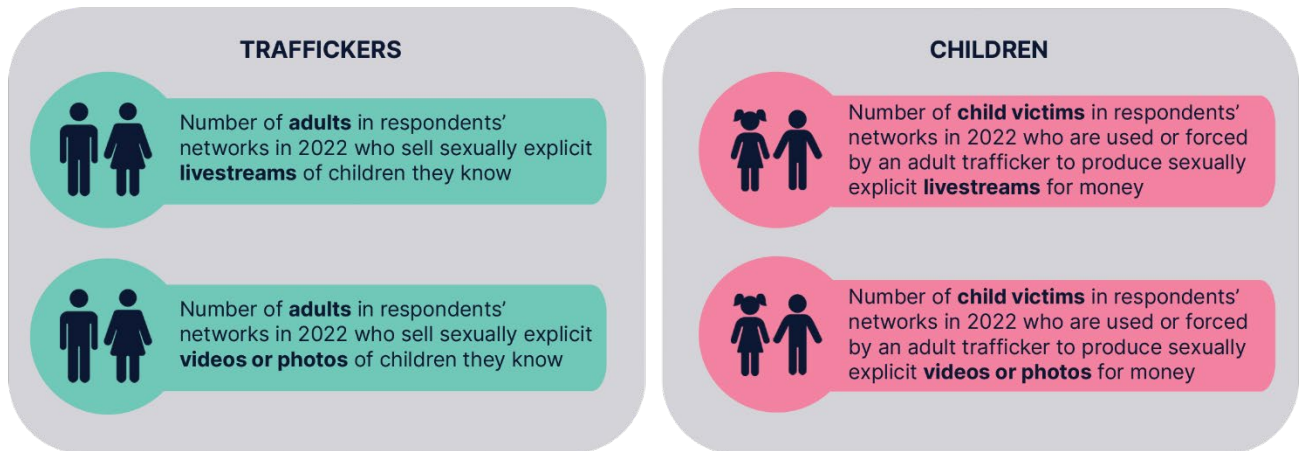
To develop and advise on the methodology, IJM and the Rights Lab convened a 24-member External Advisory Council of world-class experts, researchers, and field practitioners across technology, financial, government, and non-government/child protection sectors, relevant to tackling trafficking to produce CSEM. The **primary research objectives** were to:

1. Produce national prevalence **estimates** of the number of children who were victims of trafficking for CSEM production and the number of traffickers involved in CSEM production in the Philippines.
2. Design, develop, and test a survey that IJM can replicate to estimate national prevalence over time.

Study Implementation

A Survey Design Advisory Group of research and academic experts advised on the national household survey using the Network Scale-Up Method (NSUM) approach. The NSUM survey asked the number of adult traffickers and child victims respondents knew were involved in trafficking of children to produce CSEM. Ipsos Philippines, a leading global marketing and research institution, implemented the survey nationwide.¹¹

Four Key Prevalence Measures



Alongside the national household survey, survivor engagement was a critical component. Survivor consultants and leaders informed and co-designed the survey by drawing from their lived experience of exploitation and community knowledge in the Philippines.

Survivor consultants also co-designed and facilitated two focus group discussions (FGDs) with survivor leaders from the Philippine Survivor Network.

The FGD themes centered on the following:

1. Perspectives about trafficking to produce child sexual exploitation material in the communities and current efforts to address it; and
2. Evaluating and reviewing the study's findings, detailing from their perspectives how these may be used to create a positive impact across communities in the Philippines.

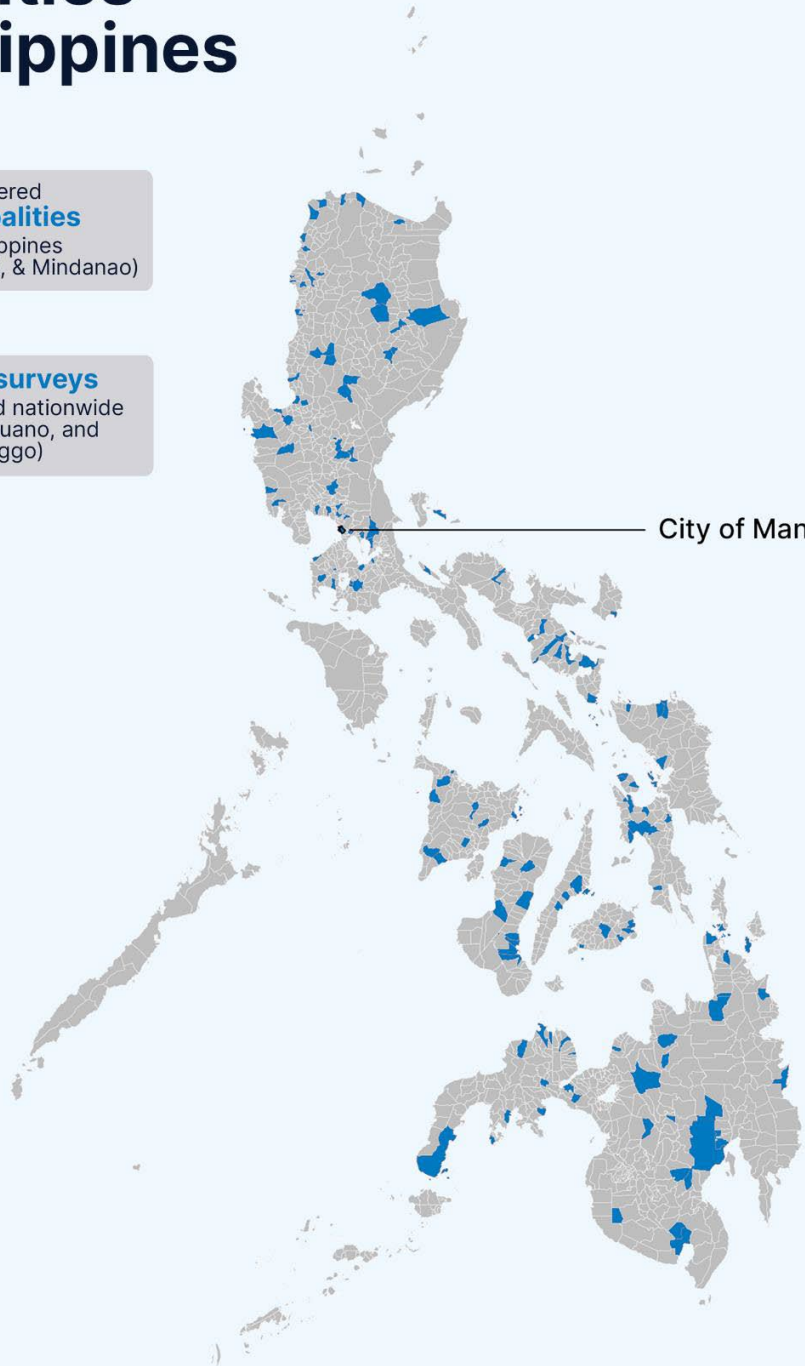
Surveyed Municipalities in the Philippines



The survey covered **150 municipalities** across the Philippines (Luzon, Visayas, & Mindanao)



3,600 total surveys were conducted nationwide in Tagalog, Cebuano, and Hiligaynon (Ilonggo)



City of Manila

 Surveyed Municipalities



Stock Photo. Not actual survivors.

SCALE OF HARM

Findings



Findings



VICTIMS

Nearly **half a million** Filipino children were *trafficked to produce new child sexual exploitation material in 2022.*



PERPETRATORS

Nearly a **quarter of a million** adult Filipinos *trafficked children to produce new child sexual exploitation material in 2022.*

Here are additional *Scale of Harm* findings, alongside key IJM 2020 study findings:

2020 OSEC STUDY



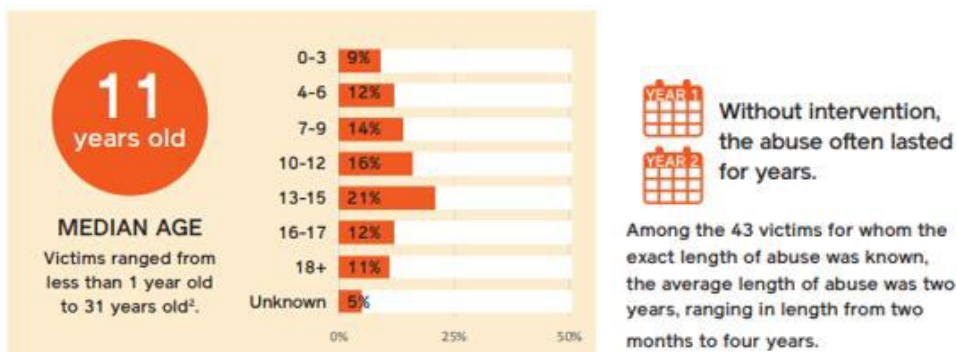
SCALE OF HARM



IJM CASEWORK DATA



According to IJM’s 2020 study, victims were abused from between two months to four years with the average duration of abuse being two years. In addition, the 2020 study found the average age of victims was only 11 years old with the youngest under one year old, which is consistent with ongoing casework.¹²



Summary of Survivor Engagement FGD Results



1. Various **social** and **cultural factors** contribute to **low levels of reports** made to law enforcement, particularly in circumstances where potential witnesses or reporting parties in the community have existing relationships with traffickers. Some of them are relatives and neighbors who do not want to “meddle” in the affairs of others and choose to remain quiet about it.



2. Current **community efforts** and capacity at the local law enforcement and barangay level are **inadequate** in preventing and reducing the trafficking of children to produce CSEM.



3. There are several intersecting reasons why survey respondents might not have wanted to disclose knowledge of traffickers or victims when taking the survey. These include social and cultural issues associated with **family** and **community loyalty**, as well as being fearful of traffickers (including the risk of being implicated themselves as beneficiaries of this form of trafficking).



4. Some traffickers try to **conceal** their activity by using **falsified details** online and selecting **physical locations** where they are unlikely to be disturbed.



5. Trafficking to produce child sexual exploitation material is perceived as a **financially lucrative activity**.



6. Awareness and understanding of adults sexually abusing children to sell livestreams, images, and videos in the Philippines **varies** between people, and work is needed to **educate** and build understanding about specific issues linked to creating new child sexual exploitation images and videos, including livestreaming.



7. There is a **lack of understanding** regarding how some online behaviors constitute **exploitation**, particularly in circumstances where demand-side offenders pay children and adolescents directly for child sexual exploitation material online.



8. *Scale of Harm* drawing additional attention to the crime is a **mechanism** to help address it and help other **young people** feel **seen** and have a **voice**.



9. Not everyone surveyed would likely be aware of the **specifics** of this form of abuse as **different terms** are used locally (such as: *show*, *cybersex*, *internet*, *taking pictures*, *“chat chat,”* *“nagtrabaho sa iyang office sa kwarto”* [*working in her office in the room*], *cyber*, and *child abuse*) to refer to the crime and behaviors associated with it, including terms that **minimize** the harm.



SCALE OF HARM

Recommendations

Recommendations

While the Philippine government and relevant stakeholders have made significant progress, the *Scale of Harm* findings demonstrate the need for accelerated action in the Philippines and in demand-side countries (e.g., U.S., UK, Australia, Canada, EU) to combat the trafficking of children for livestreamed child sexual abuse and CSEM production. Equipped with prevalence estimates, the Philippine government and all relevant stakeholders can shape future goal setting and enhance the overall strategy to combat this form of online sexual exploitation of children. The *Scale of Harm* findings highlight the urgent need to intensify offender deterrence efforts through law enforcement and other local means, incorporate safeguards and preventative technology in live video-chat apps and platforms, enhance tech sector detection and reporting of first-generation or new CSEM, and ensure the financial sector promptly detects, reports, and blocks suspicious transactions, while sharing intelligence from suspicious transaction reports with law enforcement. Here are key recommendations from the study:



Recommendation #1

Cultivate community-based reporting.

Implement national and local strategies to increase local community reports.

Government, NGOs, community leaders, LGU officials, and the public should cultivate increased reporting of trafficking to produce child sexual exploitation material from the community and support efforts to deter traffickers.

The *Scale of Harm* findings showed that trafficking to produce CSEM is widespread across the Philippines and underreported by the community. This scale, coupled with the hidden nature of the abuse, the young age of victims, the role of family perpetrators, and social and cultural factors such as not “meddling” in the affairs of others, necessitates increased community-based reporting. Community leaders and Local Government Units (LGUs) should seek to debunk the myths that livestreaming the sexual abuse of children or selling new CSEM photos and videos is a “family matter”, or an acceptable way to earn money, or that reporting is inappropriate.

Moreover, efforts to increase opportunities to report suspected child sexual exploitation in the community should be promoted because communities play a crucial role in protecting children from online sexual exploitation before it happens. More defined reporting mechanisms at the community level are needed. Incentivizing reporting by ensuring privacy, confidentiality, and even anonymity of those making reports is consistent with survivor leader FGD results. Survivors explained that community members are often afraid to report exploitation, avoiding involvement since they may know the traffickers.

Survivors recommended additional capacity building among local officials to effectively prioritize and address cases of trafficking to produce CSEM, including via livestreaming. There is a need to provide technical support to local governments and civil society to strengthen community-based mechanisms for identifying and preventing online sexual exploitation of children. Community Watch Groups can be organized and trained, and community-based monitoring systems can be established. Barangay Councils for the Protection of Children (BCPCs) can be given technical assistance to strengthen their systems for collecting and reporting data on online sexual exploitation of children to the mandated police units.



Recommendation #2 **Enhance criminal justice response.**

Holding offenders accountable is crucial for establishing a stronger deterrent and reducing prevalence.

Alongside increased community-based responses, Philippine law enforcement efforts at the national, regional, and local levels should intensify to apprehend and prosecute more traffickers, thereby creating deterrence while safeguarding victims. Demand-side law enforcement should hold accountable more demand-side offenders too.

Philippine law enforcement actions against trafficking to produce child sexual exploitation material are commendable, given limitations in staffing and resources. Still, Philippine law enforcement should intensify their enforcement interventions. The Philippine government can evaluate potential institutional, staffing, or budget enhancements to expedite effective investigations, increase arrests of suspected traffickers, and bring more victims to safety. For instance, if the Philippine National Police - Women and Children Protection Center (WCPC) became a National Operating Support Unit (NOSU), it would have greater budget, staffing, and resources to combat this crime nationally in line with its mandate and in coordination with local police units.

Similarly, the National Bureau of Investigation Anti-Human Trafficking Division (NBI-AHTRAD) is tasked with investigating trafficking of children to produce CSEM offenses across the Philippines but remains a small team with personnel only in Metro Manila. Expanding the capability of NBI-AHTRAD and regional NBI offices to respond to these cases through increased personnel, funding, and equipment will result in more arrests and more victims brought to safety, creating greater deterrence and relieving children of ongoing abuse.

Demand-side governments, including the U.S., U.K., Australia, Canada, Germany, France, the Netherlands, and other European nations,¹³ from where offenders fuel trafficking to produce CSEM, should also intensify their efforts to identify, arrest, and hold more offenders accountable. Accountability includes ensuring offenders receive a prison sentence commensurate to the harm they caused and pay restitution or compensation to Filipino survivors, supporting survivor recovery. Offender progression should also be examined to, as much as possible, prevent men from desiring to consume child sexual exploitation images, videos, and livestreams in the first place.

There is a scarcity of data on the number of arrests, prosecutions, and restitution orders for offenders who create demand for this crime. Yet those cases will not only lead to accountability for demand-side offenders, but when shared as referrals with Philippine law enforcement can support investigations, victim safeguarding, and trafficker identification. Continued close international law enforcement collaboration through the Philippine Internet Crimes Against Children Center (PICACC) will thus significantly support increased enforcement operations. As of August 2023, PICACC has supported the arrest of 131 suspects and safeguarding of 644 victims and at-risk individuals.

Finally, new Philippine Anti-OSAEC (online sexual abuse and exploitation of children) and Anti-Trafficking laws enhanced the authority of investigators to conduct thorough analysis of electronic communication devices. Philippine law enforcers' use of this investigative technique will increase intelligence regarding additional victims and demand-side offenders for sharing to their counterparts in demand-side countries. Proactive sharing of referrals by both demand and source-side law enforcement creates a "referral loop" that nets greater numbers of offenders earlier in their offending. Earlier accountability could drive deterrence and, crucially, reduce the months or years that children suffer abuse.



Recommendation #3
Implement robust community-based efforts.

Additional local efforts are required to prevent, frustrate, and disrupt.

Alongside increased law enforcement interventions, additional local efforts to prevent, frustrate, and disrupt the trafficking of children to produce CSEM should be deployed through robust community-based norms change and sensitization.

Philippine law enforcement efforts should be supplemented with other interventions to prevent, frustrate, and disrupt offending that may never be subject to investigation. These additional preventative solutions will help protect children from sexual exploitation and reduce prevalence. Community sensitization through survivor leadership and advocacy can accelerate norms change leading to local deterrence. Survivor leaders can highlight the devastating harm to victims from online exploitation, raise awareness, and create a sense of urgency in the community. LGU ordinances can embed resources and prioritization at the local level, signaling to perpetrators that their days of impunity are over and offending carries enforcement risks.¹⁴ As of July 2023, 15 LGUs in the Philippines have passed ordinances localizing the Anti-OSAEC law; every LGU should do likewise.



Recommendation #4
Enforce Anti-OSAEC Law tech provisions.

Ensure tech companies use technology designed to prevent or disrupt livestreamed child sexual abuse, including manufacturers of camera-enabled devices.

The Philippine government should enforce and, if needed, enhance regulations mandating the use of safety by design technology designed to detect, prevent, and disrupt the production and distribution of livestreamed child sexual abuse and other CSEM images and videos at scale.

Critical safeguards and preventative technology should be integrated into live video apps and platforms to prevent the production of new child sexual exploitation material. The sheer scale of livestreamed child sexual abuse in the Philippines necessitates such technological prevention in video-chat apps and platforms on which child sexual abuse is produced and transmitted live. Fortunately, sophisticated safety technology trained on Internet Watch Foundation data already exists that can detect and prevent streaming of child sexual abuse, such as SafeToWatch, with or without a report.¹⁵ And the Philippine Survivor Network has publicly called for the tech sector to use such technology.¹⁶

The Philippine government should therefore ensure robust enforcement of and compliance with new Anti-OSAEC law provisions requiring tech companies to “install mechanisms or measures designed to prevent, detect, respond or report” child sexual abuse and exploitation material and “install available technology, program[s], or software to ensure that access to or streaming of violations of this Act will be removed, blocked, or filtered.” [Republic Act 11930, Section 9(a)(6), emphasis added]. Companies operating in the Philippines should be required to report to the Philippine government their compliance with this provision, considering the alarming scale of livestreamed child sexual abuse of Filipino children.

The Philippine government should also explore the use of existing or enhanced regulations to require manufacturers of camera-enabled devices, such as phones, tablets, and laptops, to embed safety technology on devices designed to prevent and disrupt livestreamed child sexual abuse. Today’s phones are not “safe by design” precisely because they are built without any technology intended to prevent child abuse images and videos from being taken or streamed.

The tech sector should also improve timely detection, reporting, and deterrence of new or “first-generation” CSEM images and recorded videos, and suspected trafficking to produce CSEM, to facilitate swift action to safeguard victims

and apprehend suspects. IJM is prepared to support such efforts by providing our updated 2023 product, “*Tech and Financial Sector Indicators of Livestreaming Online Sexual Exploitation of Children*” to interested companies or regulators, along with related consultation.¹⁷

It is crystal clear that tech companies, including Telecoms, can be a force for good to address child sexual exploitation in the Philippines. For instance, the Philippine’s largest fully integrated telecom company PLDT Inc. (PLDT) and its wireless subsidiary Smart Communications, Inc. (Smart) supported the *Scale of Harm* project by providing anonymized and aggregate data and information relevant to IJM and the Rights Lab’s ongoing analysis to develop more localized insights. Moreover, PLDT and Smart reported blocking over 586,000 URLs and about 1.3 billion user attempts to access online materials linked to child sexual abuse or exploitation, with Globe also blocking access.¹⁸

This is significant because unfettered access to child sexual abuse images and videos online may help normalize the sexual abuse of Filipino children in the community as more people consume such digital content and become desensitized to it. While blocking access to this illegal and harmful content is critical, there is an urgent need to go upstream and adopt more preventative approaches as discussed above.



Recommendation #5

Expedite detection, reporting, and blocking of suspicious financial transactions.

Private sector efforts are pivotal to gaining timely intelligence on suspected traffickers, supporting law enforcement intervention, and preventing abuse.

Banks and money service businesses must act with urgency to implement effective transaction monitoring to detect suspicious payments indicative of online sexual abuse and exploitation of children (OSAEC), apply enhanced due diligence if suspicions exist, expedite suspicious reporting, and block payments involving known or suspected offenders and traffickers.

Trafficking to produce CSEM is a commercial crime – without payment there is no incentive for criminals to abuse children. Survivor leaders shared that traffickers usually receive money through money service businesses in their local communities and assign a household member with a valid identification card to collect in cash the payments sent by foreign offenders before abuse is committed and streamed online.

An April 2023 AMLC report reveals that in 2022, AMLC received from financial institutions 92,200 suspicious transaction reports (STRs) relating to OSAEC. AMLC further reported that they analyzed 182,729 OSAEC-related STRs with an aggregate amount of PhP1.56 billion from mid-2020 to the end of 2022. Per AMLC, 81% of these are incoming foreign remittances, with the United States, United Kingdom, Australia, and Canada being the top sending countries in volume and PhP value since 2015. The number of STRs shared with law enforcement is unknown.

This is a staggering amount of money remitted to the Philippines, apparently for the sexual abuse and exploitation of Filipino children.

In light of the prevalence of this financially motivated abuse of children, Philippine money service businesses, principally remittance companies, should improve transaction monitoring capability to identify payments indicative of OSAEC. This means applying all child exploitation typologies and monitoring behavior over time and not just single transactions. They should collaborate with law enforcement and advocacy groups to understand and adapt to evolving trends. To assist the AMLC and law enforcement, STRs should capture all available information, not just the minimum required, to provide actionable intelligence. Moreover, banks and money service businesses should treat suspicious child exploitation payments like terrorist financing or fraud by striving to detect and report within five days of activity, not the current 50 to 100 days typical of anti-money laundering reporting.

Beyond expedited reporting, banks and remittance companies should agree with regulator protocols for the delay or even blocking of suspicious payments. As a commercial crime, the absence of payment to traffickers can prevent livestreaming of abuse, thus safeguarding Filipino children from sexual abuse. Therefore, if there are any suspicions, money service businesses should apply greater scrutiny to the transaction *before releasing payment*. Such enhanced due diligence could include seeking additional information substantiating the relationship between the party sending money and the person collecting the payment. Such simple questions can act as a deterrent without creating a burden for legal payments.

Finally, establishing and strengthening cooperation among the financial sector, AMLC as the financial intelligence unit, and law enforcement will support timely sharing of actionable intelligence to aid law enforcement. Timely identification of traffickers and their victims will erode the environment of impunity, disrupt the trade and act as a deterrent. Active collaboration between AMLC and Philippine and foreign law enforcement can maximize the usefulness of intelligence to support investigations leading to children brought to safety and offenders restrained. It must be stressed that the payments ecosystem will continue to evolve. Regulators, banks and remittance companies will need to monitor these changes and adapt monitoring and deterrence as criminals seek to circumvent controls and detection.

The financial sector must act with urgency with suspicious transactions related to online sexual abuse and exploitation of children by detecting suspicious payment patterns, blocking such payments, expediting reporting, and proactively collaborating with law enforcement.



Recommendation #6

Demand-side governments should urgently pass online safety legislation with survivor consultation.

Legislators should champion survivor experiences.

Governments globally must urgently pass online safety legislation with survivor consultation.

Online safety legislation can facilitate the protection of children from sexual abuse and exploitation online, including abuse streamed in video calls and other CSEM production. Critically, it can require tech companies to detect, report, and remove child abuse material online, including new or “first-generation” CSAM. While individual companies have made promising commitments and taken some positive actions, children need tech spaces governed by industry wide standards for safety by design that prevent harm, along with proactive detection, reporting, and removal of child sexual abuse. At the very least, jurisdictions like the EU should ensure that tech companies are *allowed* to engage in voluntary actions to detect, report, remove and block CSEM within the EU, pending the passage of robust regulation.

Lawmakers in the United States,¹⁹ United Kingdom,²⁰ and European Union²¹ should courageously seize the moment to pass substantial online safety legislation increasing protections for children and transparency by tech companies in developing technology safe by design. Online sexual exploitation survivors from the Philippine Survivor Network²² are advocating for passage of these bills, writing letters and speaking directly to governments about their lived experiences and how these laws could significantly reduce and prevent traumatic abuse. Survivors have unique insights into systems that work and do not work. Legislation informed by survivor consultation and expertise can more comprehensively meet the safety needs of children.²³ *Scale of Harm* reminds us all why these laws are urgently needed.



Recommendation #7

Further survivor-informed research is critical.

Investigating the normalization of online sexual exploitation of children for financial gain.

Survivors propose future research studies should investigate the normalization of online sexual exploitation of children, particularly demand-side offenders engaging in online relationships with children and local traffickers who seek financial gain.

Future research studies could contribute to understanding financial aspects of livestreaming and how private sector data can aid measurement research. For instance, studies that focus on the following will offer invaluable insights: i) behaviors and progression of demand-side offenders who pay for and direct new CSEM production and ii) adults who produce CSEM for financial gain.

Data collaboration among the private sector, academia, government, and NGOs may offer greater understanding of the scale of trafficking to produce CSEM in other countries, among other forms of child abuse online. Anonymized, aggregate, and privacy-preserving private sector data collaboration from financial, social media, live-video, and telecommunication companies can be utilized for future research and measurement studies. Government requirements for tech transparency and reporting could support the use of private sector data to gain a more comprehensive understanding of the problem.

Most critically, like *Scale of Harm*, people with lived experiences should be integral to research such as the design, data analysis, and interpretation of results.

Endnotes

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- ¹ See Republic Act No. 10364 at <https://www.officialgazette.gov.ph/2013/02/06/republic-act-no-10364/>.
- ² INTERPOL, “INTERPOL report highlights impact of COVID-19 on child sexual abuse.” 7 September 2020, <https://www.interpol.int/en/News-and-Events/News/2020/INTERPOL-report-highlights-impact-of-COVID-19-on-child-sexual-abuse>.
- ³ Europol, “Internet Organised Crime Threat Assessment (IOCTA) 2020.” Last updated 7 December 2021, <https://www.europol.europa.eu/activities-services/main-reports/internet-organised-crime-threat-assessment-iocta-2020>.
- ⁴ WeProtect Global Alliance, “Global Threat Assessment 2021.” (Report, WeProtect Global Alliance). <https://www.weprotect.org/wp-content/plugins/pdfjs-viewer-shortcode/pdfjs/web/viewer.php?file=/wp-content/uploads/Global-Threat-Assessment-2021.pdf&dButton=true&pButton=true&oButton=false&sButton=true%22%20%22zoom=0&pagemode=none>.
- ⁵ See Colombia February 2023 case where police safeguarded three children: 19 months, seven and nine years, and arrested their mother and aunt accused of livestreaming child sexual abuse for profit, “Horror en Medellín: madre obligaba a sus tres hijos de 19 meses, 7 y 9 años a grabar pornografía infantil.” 27 February 2023, <https://www.semana.com/nacion/articulo/horror-en-medellin-madre-obligaba-a-sus-tres-hijos-de-19-meses-7-y-9-anos-a-grabar-pornografia-infantil/202311/>); See Brazil case, “Brazil: Two arrested in global hunt to catch child predators.” 14 April 2021, <https://www.interpol.int/en/News-and-Events/News/2021/Brazil-Two-arrested-in-global-hunt-to-catch-child-predators#:~:text=In%20August%202020%2C%20disturbing%20footage.for%20Missing%20and%20Exploited%20Children>; See Romania case, “Sask. Appeal Court increases sentence for child pornographer Philip Chicoine – Saskatoon.” 17 October 2019, <https://globalnews.ca/news/6042218/appeal-court-increases-sentence-for-child-pornographer-philip-chicoine/>; See Thailand case, “Man pleads guilty to seeking violent sex abuse images from source in Thailand.” 24 July 2023, <https://www.abc.net.au/news/2023-07-24/arslan-safdar-guilty-in-sex-transmission-case/102641592>.
- ⁶ eSafety Commissioner, “Basic Online Safety Expectations: Summary of industry responses to the First mandatory transparency notices.” December 2022, <https://www.esafety.gov.au/sites/default/files/2022-12/BOSE%20transparency%20report%20Dec%202022.pdf>.
- ⁷ National Center for Missing & Exploited Children, “CyberTipline 2022 Report.” <https://www.missingkids.org/gethelpnow/cybertipline/cybertiplinedata>.
- ⁸ ECPAT, INTERPOL, and UNICEF. (2022). Disrupting Harm in the Philippines: Evidence on online child sexual exploitation and abuse. Global Partnership to End Violence Against Children. <https://ecpat.org/resource/disrupting-harm-philippines/#:~:text=Disrupting%20Harm%20in%20the%20Philippines.of%20children%20in%20the%20Philippines>.
- ⁹ See International Justice Mission’s prevalence studies: <https://www.ijm.org/studies>.
- ¹⁰ Haarr, R. (2017). Evaluation of the Program to Combat Sex Trafficking of Children in the Philippines: 2003-2015. https://ijmstoragelive.blob.core.windows.net/ijmna/documents/studies/philippines-csec-program-evaluation_2021-02-05-063357.pdf.
- ¹¹ Ipsos Global Market Research and Public Opinion Specialist, <https://www.ipsos.com/en-ph>.
- ¹² International Justice Mission, “Online Sexual Exploitation of Children in the Philippines: Analysis and Recommendations for Governments, Industry, and Civil Society.” 2020, <https://www.ijm.org.ph/assets/resource/IJM-OSEC-in-the-Philippines-Analysis-and-Recommendations-for-Governments-Industry-and-Civil-Society-Full-2020.pdf>.
- ¹³ See Anti-Money Laundering Council, “Online Sexual Abuse and Exploitation of Children in the Philippines: An Evaluation Using STR Data (July 2020 – December 2022).” April 2023, <http://www.amlc.gov.ph/16-news-and-announcements/454-online-sexual-abuse-and-exploitation-of-children-in-the-philippines-an-evaluation-using-str-data>. Anti-Money Laundering Council reports that since 2015, the top sources of OSAEC-related remittances in terms of volume and PhP value include the United States, United Kingdom, Australia, and Canada.
- ¹⁴ IJM has provided training and consultation to support the passage of LGU ordinances. See <https://www.ijm.org.ph/articles/ijm-works-with-local-lawmakers-to-strengthen-child-protection-in-communities>.

¹⁵ See SafeToWatch, a real-time video & image threat detection technology, capable of determining whether visual data represents CSAM. The machine-learning algorithm can trigger several possible actions, such as obscuring harmful images, disabling image capture/recording/transmission, etc., <https://safetonet.com/safetowatch/>.

¹⁶ See letter of the Philippine Survivor Network to the European Parliament and European Union Council: https://www.ijm.org.ph/assets/resource/PSN_Letter_to_EU_Parliament_and_Union_Council.pdf.

¹⁷ Interested parties may emailing endosec@ijm.org to request the product.

¹⁸ The Geneva Internet Platform Digital Watch Observatory, “*A collective effort: Philippines fights online child sexual abuse.*” 12 June 2023, <https://dig.watch/updates/a-collective-effort-philippines-fights-online-child-sexual-abuse>.

¹⁹ See EARN IT Act: <https://www.congress.gov/bill/118th-congress/senate-bill/1207>;

See REPORT Act: <https://www.congress.gov/bill/117th-congress/senate-bill/1540>;

See Preventing Child Sex Abuse Act: <https://www.congress.gov/bill/118th-congress/senate-bill/724>;

See Kids Online Safety Act: https://www.blumenthal.senate.gov/imo/media/doc/kids_online_safety_act_-_one_pager.pdf;

See STOP CSAM Act: <https://www.congress.gov/bill/118th-congress/senate-bill/1199/text>.

²⁰ UK Parliament, “*Online Safety Bill.*” <https://bills.parliament.uk/bills/3137>.

²¹ European Union, “*Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL laying down rules to prevent and combat child sexual abuse.*” <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2022%3A209%3AFIN>.

²² See “*Philippine Survivors Urge EU Parliament and Council for Stronger Legislation.*” 25 April 2023, <https://www.ijm.org.ph/articles/philippine-survivors-urge-eu-parliament-and-council-for-stronger-legislation>; See “*Survivors Call for Action - Online Safety Bill.*” April 2022, <https://www.ijmuk.org/stories/survivor-letter-to-uk-government-online-safety-bill>.

²³ International Justice Mission, “*We’re Closer to Protecting Kids from Sexual Abuse Online.*” <https://www.ijm.org/news/were-closer-protecting-kids-sexual-abuse-online#:~:text=John%20Tanagho%20is%20Executive%20Director.excellence%20of%20International%20Justice%20Mission>.



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