

Multi-stakeholder Dialogue on Consent and Safety in Adult Content Distribution

Background Paper



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Introduction

Our society's War on Sex has painted a target on the back of its most marginalized communities, such as sex workers and LGBTQ+ people. Not only are these communities disproportionately deplatformed and censored, but they are also stigmatized and scapegoated for problems of image-based sexual abuse.

Yet the reality is that 18+ communities are fierce and effective champions of consent and safety in adult content distribution. From advocating for (and providing) comprehensive sex education, to holding tube websites accountable for non-consensual content, to developing frameworks for negotiating and recording consent, these communities have deep experience in abuse prevention. You'll see some of their work reflected in this background paper.

Nevertheless, while payment companies and platforms have been introducing new restrictions on the distribution of adult content online, the wisdom of these 18+ communities has been ignored, and their rights have been sacrificed. This doesn't serve survivors of image-based sexual abuse, but only makes solving the problem harder.

This event, a Multi-Stakeholder Dialogue on Consent and Safety in Adult Content Distribution, seeks to change that. Bringing together representatives from across a spectrum of 18+ communities and industry sectors, participants will share their own best practices for the elimination of image-based sexual abuse while seeking to uphold the rights and freedoms of marginalized communities.

Not everyone who attends will find their ideas reflected in this background paper, or will agree with those presented here. In fact, we hope that they don't. After all, the purpose of bringing together this diverse group is to generate new ideas, and to unearth existing best practices that have been overlooked, discounted, or co-opted in mainstream debates around image-based sexual abuse.

The purpose of this background paper, rather, is to lay out what we already know. Not to endorse solutions, but to map out the terrain and to promote discussion about the way forward. The paper has been developed through background research and conversations with the

co-organizers of the Multi-Stakeholder Dialogue. If you'll be at our meeting on September 17, we encourage you to read it so that you will have a head-start on the day.

What follows will be a process in which participants with a range of perspectives deliberate as equals, with the aim of developing a consensus around solutions to the shared problem of non-consensual content being distributed online. Following the event, participants will be invited to continue to work online to refine its outcomes into a series of best practice recommendations, which we will present at the United Nations Internet Governance Forum in Poland on December 7.

This process is one that we've followed before. Several of the participants at this event participated in a previous Multi-Stakeholder Dialogue on Internet Platforms, Sexual Content, & Child Protection in 2019, that also included representatives from marginalized stakeholder groups, along with Internet platform representatives. Through that process, participants developed a set of principles intended to assist platforms to adopt a more nuanced and better-informed approach towards the moderation and censorship of sexual content, with a view towards protecting children from sexual abuse while also upholding their rights and the rights of others.

Since then, large platforms have increasingly disengaged from the dialogue, and determined that the rights of marginalized content creators should be treated as disposable, in the face of demands from morality groups and conservative politicians. The organizers of this Multi-stakeholder Dialogue refuse to cede the territory of sexual abuse prevention to those who would see 18+ communities censored, marginalized, and criminalized.

If we are ever to solve the problem of non-consensual sexual content being distributed online, we cannot continue to ignore the voices of 18+ communities, whose contributions to the fight against image-based abuse are indispensable, and whose rights to express themselves online are inalienable. Thank you for being a part of this important event.

Defining Non-Consensual Content

Non-consensual content can be categorized based on whether it was non-consensually produced and/or non-consensually distributed, as well as based on the age of the subject.

Child Sexual Abuse and Exploitation Material (CSAM/CSEM) concerns the production and distribution of sexualized material where the subject is legally a child (under 18 years old).¹

Adult Sexual Abuse Material or Non-consensual Intimate Imagery (NCII), a subset of which is often referred to as revenge porn, describes the dissemination of sexually explicit media without an individual's consent. There are three high-level types of non-consensually distributed sexual abuse material. The first type includes content that is non-consensually produced and distributed (e.g., hidden camera recordings, sexual assault recordings). The second type includes content that is non-consensually obtained and distributed (i.e., through scraping adult platforms including those behind log-ins or paywalls, hacking phones or online communications, or stealing from hard drives or databases). The third type includes content a person consensually produces or distributes to certain audiences (i.e., within the context of an intimate relationship, 18+ communities) but that content is then distributed to a broader audience (including

placement on e.g., 18+ communities advertisement platforms) without consent—irrespective of the initial intention,² the lack of consent constitutes sexual abuse material. In this paper, we consider out of scope any synthetically created adult content (e.g., deep fakes).

Disproportionate Impacts of Nonconsensual Content Unfortunately, there is a gap of high quality research into the prevalence and impacts of sexual abuse material, particularly on marginalized communities. We summarize the current body of knowledge regarding the disproportionate impacts of NCII but note that these studies available for reference are limited or may be subject to methodological limitations.

LGBTQ+ COMMUNITIES

LGBTQ+ individuals are disproportionately victims of nonconsensual distribution of sexual abuse material (both children and adults).³ Within the LGBTQ+ community, the central strategies to combating this issue include: (1) ensuring access to sex-positive LGBTQ+ education in schools; (2) improving the gaps in legal resources (namely, responses from law enforcement); and (3) offering informed counselors trained in helping digital sexual abuse victims.⁴

¹ See the OHCHR's "Terminology Guidelines for the Protection of Children from Sexual Exploitation and Sexual Abuse": https://www.ohchr.org/Documents/Issues/Children/SR/TerminologyGuidelines_en.pdf.

² The Cyber Civil Rights Initiative estimates that only ~20% of NCII cases are aimed at causing harm while the majority are "motivated by something else: a desire for profit, notoriety, social standing, amusement, voyeurism, or no particular reason at all": <https://www.cybercivilrights.org/2019-publication/>

³ See the Data & Society's report on Non Consensual Image Sharing: https://datasociety.net/pubs/oh/Nonconsensual_Image_Sharing_2016.pdf

⁴ See the <https://www.aclu.org/issues/lgbtq-rights/lgbtq-youth/anti-lgbtq-web-filtering> and Powell, A., Scott, A. J., & Henry, N. (2020). Digital harassment and abuse: Experiences of sexuality and gender minority adults. *European journal of criminology*, 17(2), 199-223. <https://journals.sagepub.com/doi/pdf/10.1177/1477370818788006>.

OTHER MINORITY GROUPS

The LGBTQ+ community is not the only community disproportionately targeted by the distribution of nonconsensual sexual abuse and exploitation material. Individuals from low-income households, people of color, people with disabilities,⁵ and women experience the distribution of non-consensual content with a higher frequency.

Younger people (ages 15-29) and in particular young women are at higher risk of NCII: one in 10 women under the age of 30 have experienced threats of nonconsensual image sharing.⁶ Case studies investigating NCII in Pakistan found that 70% of women are afraid to post their pictures online as they fear misuse of their images.⁷

Unfortunately, many technological strategies to mitigate nonconsensual distribution of sexual abuse material also disproportionately harm people of color, LGBTQ people, and 18+ communities as discussed further in the Content Moderation, Industry, and Finance section.

⁵ Henry, N., Powell, A. & Flynn, A. (2017). Not just `revenge pornography': Australian's experiences of image-based abuse. Melbourne, Australia: RMIT University. Retrieved from: https://www.rmit.edu.au/content/dam/rmit/documents/college-of-design-and-social-context/schools/global-urban-and-social-studies/revenge_porn_report_2017.pdf

⁶ See Data & Society's report on Non Consensual Image Sharing: https://datasociety.net/pubs/oh/Nonconsensual_Image_Sharing_2016.pdf

⁷ See report from the Digital Rights Foundation: <https://digitalrightsfoundation.pk/wp-content/uploads/2017/05/Hamara-Internet-Online-Harassment-Report.pdf>

Existing Strategies to Prevent Non-Consensual Content Distribution

18+ COMMUNITIES

18+ communities use a number of different strategies to protect their content that seek to curb both non-consensual production and non-consensual distribution of content depicting them.

To prevent non-consensual distribution 18+ communities employ: (1) consent documentation⁸; (2) watermarking, including adding the recipient's name and address on the photo⁹; (3) end-to-end encrypted transfer of content that restrict content description to the sender/receiver; (4) legal strategies such as Digital Millennium Copyright Act (DMCA) takedown notices¹⁰ or cease and desist letters;¹¹ (5) platform approaches such as reporting stolen content, submitting content for digital fingerprinting, and transfer of content that was originally posted to the individual's verified account; (6) use of third-party services that purport to search the internet for unauthorized distribution of existing content¹²; and community organizations¹³ that can offer support and/or directly interface with platforms.

Options to prevent non-consensual production or collection of content are limited, but include (1) use of devices to scan for hidden cameras

(e.g., radio frequency, GPS, and/or magnetic field scanning devices) and (2) use of anti-virus and anti-spyware apps to prevent spyware from being installed on devices and used to collect personal data such as images or videos.

These existing approaches have a number of limitations. First, current norms (e.g., 2257 forms used in pornography production) often lack specificity in consent documentation. To maximize its usefulness, consent documentation should be detailed and specific. For example, documenting the consent of all persons depicted, what language can be used to describe the content, where, under what conditions (e.g., behind paywall) and for how long it can be distributed. Additional limitations include a reliance on legal identification (especially for use of legal approaches), which prevents safe separation of work and legal identities. Relatedly, platform reporting mechanisms require (a) proving content ownership and (b) knowing where content is (also true with DMCA reporting). Further, on mainstream platforms, reporting harm may result in an entire profile being removed for association with adult content.

⁸ Beyond consent for content, 18+ communities may use Non Disclosure Agreements (NDAs) as a preventative measure with romantic interests, friends, families and even clients to maintain anonymity and/or avoid the non-consensual distribution of sexual content.

⁹ A Cyber Civil Rights Initiative report suggests this approach would have deterred 31% of perpetrators of NCII: <https://www.cybercivilrights.org/wp-content/uploads/2017/06/CCRI-2017-Research-Report.pdf>.

¹⁰ For an explanation of DMCA, see: <https://www.muso.com/magazine/dmca-explained>. Creating and sending a DMCA takedown notice can be done by anyone. However, this approach does not account for the realities of hidden camera content. DMCA's only apply to individuals who own the copyrights to the content. If one were to be secretly recorded, they could not file a DMCA, as they do not "own" the content.

¹¹ A cease and desist letter puts a person or business on notice that they are engaging in illegal activity.

¹² An example of such a service is "Cam Model Protection": <https://cammodelprotection.com/>.

¹³ For example, SWOP Behind Bars (<https://www.swopbehindbars.org/>) and Pineapple Support (<https://pineapplesupport.org/>).

INDUSTRY & FINANCE

Adult Industry

The adult industry utilizes four standard techniques for preventing CSAM/CSEM:

Automated detection of CSAM/CSEM images. Platforms use software to check new uploads against databases of known CSAM/CSEM maintained by NCMEC/IWF/Interpol. Additionally, platforms may use software that attempts to identify not-yet-known CSAM/CSEM images using AI algorithms.¹⁴ Limitations of this approach include a lack of transparency regarding the vetting of the images that are added to this database, a lack of transparency around the precision of the algorithms used to match content against this database or to perform AI-based content classification, and the proprietary nature of the algorithms commonly used for matching as some organizations (e.g., Thorn, PhotoDNA) may deny adult industry platforms from accessing their resources.¹⁵

Age Verification for Performers. Traditionally, the adult industry has relied on 2257 forms for verifying the age of performers. Traditionally tube sites might verify the account of a porn studio, which the tube site expected to maintain model releases and 2257 records. However, with the proliferation of smaller and independent content creators and after the recent pressure from Mastercard/Vis¹⁶ a there has been a shift toward using AI and/or government ID to verify the age of all performers in a piece of content. Standards for such verification

are not consistent across the industry, and current age verification approaches typically focus only on commercial pornography websites and ignore adult content on websites such as Reddit and Twitter.¹⁷ Limitations to this approach include the inability to separate and/or verify work and legal personas, issues with performers who have aged or are wearing costumes (e.g. cosplayers) who may not be recognized as matching their verified ID, and platforms removing content where an ID has expired even if it was current at the time of production.

Manual review. Content moderators may manually review all uploaded content before it goes public to identify “obviously” underage performers. Limitations of this approach include issues with scaling as the number of videos being uploaded continues to grow¹⁸ and issues of bias in which particular performers (e.g., Asian women) or content (e.g., age-play) may be removed at higher rates.

User reporting of content. User reporting can take two forms: reporting of a specific piece of content directly, or alerting the platform to content they suspect has been uploaded that should be removed. Users can report content that violates the platform guidelines. Limitations of this approach include misuse -- some antiporn groups will mass-report content causing loss of income and harm to creators -- and re-traumatization: many adult platforms do not have a way for non-viewers to report CSAM/CSEM content without visiting a specific

¹⁴ See <https://1ight.com/> for an example of a tool that aims to detect unknown CSAM/CSEM.

¹⁵ For a discussion of potential privacy-preserving, cryptographically based solutions to issues of transparency in CSAM/CSEM detection, see this Boston University research summary: <https://www.bu.edu/riscs/2021/08/10/apple-csam/#ftnttwo>.

¹⁶ See <https://www.melrosemichaels.com/post/the-gospel-according-to-mastercard> to read more about pressure on MasterCard from religious anti-porn groups.

¹⁷ See <https://www.wired.co.uk/article/germany-porn-laws-age-checks> to read more about pornography sites to introduce age verification.

¹⁸ See <https://www.melrosemichaels.com/post/the-gospel-according-to-mastercard> to read more about pressure on MasterCard from religious anti-porn groups

video.

For adult NCII, there are three strategies that are used:

User Reporting. As above, this can be reporting a specific video. Alternately -- and unlike for CSAM/CSEM -- many platforms have a particular procedure (e.g., email address, form) to report that a particular piece of NCII is likely on the site and request its removal.

Content Fingerprinting. Some platforms will scan content fingerprinting databases (similar to those run by NCMEC/IWF for CSAM/CSEM) to identify and remove NCII. Some platforms submit NCII content that they have removed for digital fingerprinting -- or they will suggest that people do so themselves.

DCMA takedown requests. Platforms may act upon receiving a DCMA takedown request from the owner of a piece of content.¹⁹ Limitations of this approach include platforms declining to act on the notice because they are hesitant to enter legal disputes regarding the ownership of content or taking the notices less seriously because they are not based in the US and don't believe that the content owner will pursue international legal action.

Mainstream Internet Industry

Similar to the adult industry, to detect and prevent CSAM/CSEM, non-adult or mainstream Internet industry platforms (e.g., social media platforms, search engines) use software to

detect known CSAM/CSEM and also rely on user reporting of content; these methods have limitations as summarized above. Mainstream platforms also apply AI methods to proactively detect CSAM/CSEM using signals such as nudity detection and/or text-based context of a particular post or website.²⁰ Limitations of this approach include mistakenly flagging non-CSAM/CSEM content, whether that be 18+ community content or non-adult content.²¹

When mainstream platforms identify disallowed content, the account sharing it may receive an education message, may be closed, and/or may be reported to law enforcement. Thus, the consequences of mistakes are quite severe, especially because there is little transparency around potential appeals processes.

Additionally, mainstream platforms seek to deter users from searching for CSAM/CSEM through prevention strategies such as warning messages and advertisements (see the Prevention section for more detail).²² The mainstream industry also funds advertisement grants for reporting hotlines, victim helplines, and people running prevention advertising campaigns.

To prevent adult NCII, mainstream platforms rely on: (1) reports from users; (2) DCMA takedown requests, (3) software and database services to identify known images (e.g., in Australia, platforms utilize techniques similar to fingerprinting, where they cross reference

¹⁹ See <https://help.pornhub.com/hc/en-us/articles/360041719433-Non-Consensual-Content-Policy>

²⁰ For more information about Facebook's nudity detection tools see: <https://about.fb.com/news/2021/02/preventing-child-exploitation-on-our-apps/>

²¹ For an example of Facebook's nudity detection algorithmic mistakes see: <https://www.independent.co.uk/voices/iv-drip/breast-or-el-bow-facebook-censors-pornographic-photo-8364591.html>; for a summary of the current state of nudity detection algorithms see:

²² For more information about Facebook's nudity detection tools see: <https://about.fb.com/news/2021/02/preventing-child-exploitation-on-our-apps/>

content with flagged content from third-parties or government databases)²³ ; (4) AI systems to detect nudity,²⁴ (5) offering victim support pages²⁵ , and (6) in the case of search engines, de-indexing content, even if they are not hosting that content.²⁶ If adult abuse material is found, the images will be removed (unless of public interest), the platforms will disable accounts that shared the images without permission, and may report the user to law enforcement.

Payment Processors

Current prevention strategies applied by payment processors to prevent use of their systems to purchase NCII and CSAM/CSEM include:

Suspicious payment detection. This includes methods to detect suspicious payment patterns, such as spikes of traffic or unusual customer complaints, or a feature to report payments, fingerprinting and a database system to flag perpetrators.²⁷ Limitations of this approach include that adult industry payment patterns may look similar to NCII/CSAM/CSEM patterns and there is little transparency into what patterns are identified nor ability to contest flagged payments. To address these limitations (i.e., to avoid misplaced restrictions on their transactions), 18+ communities have increasingly shifted toward cryptocurrency

payments, which can afford a higher degree of anonymity. However, payment platforms are increasingly working to apply the same pattern detection efforts to these pseudo-anonymous payments.²⁸

Shared repositories of bad actors. Financial platforms partner with legal teams, third parties, and governments to share data and identify known bad actors. ²⁹Limitations of this approach again include a lack of transparency regarding how bad actors are identified and lack of due process in ability to contest being added to these repositories. If a person is added to these repositories they may be banned from the banking system entirely, leading to severe welfare consequences if this was done in error.

Hotlines for underserved markets to report issues. In areas lacking the legal framework to prosecute the creation and distribution of nonconsensual content, hotlines exist to report use of payment for CSAM/CSEM and, in some cases, NCII.³⁰ Limitations of this approach include malicious reporting and lack of transparency as described above.

POLICY & LAW ENFORCEMENT

Policy Approaches

A variety of policy approaches exist to address CSAM/CSEM and NCII. Here, we summarize US

²³ Read more about Facebook's non-consensual intimate image pilot: <https://about.fb.com/news/h/non-consensual-intimate-image-pilot-the-facts/>

²⁴ See Google, Facebook and Microsoft plan to combat online child sexual abuse: <https://www.cnn.com/2020/06/11/google-facebook-and-microsoft-back-plan-to-combat-child-sexual-abuse.html>

²⁵ See this Facebook page for an example: <https://www.facebook.com/safety/notwithoutmyconsent/>.

²⁶ See <https://withoutmyconsent.org/resources/something-can-be-done-guide/take-down/>

²⁷ See <https://fsi.stanford.edu/news/ncii-legislation-limitations>

²⁸ See https://cdn.icmec.org/wp-content/uploads/2021/03/Cryptocurrency-and-the-Trade-of-Online-Child-Sexual-Abuse-Material_03.17.21-publish-1.pdf

²⁹ See <https://fsi.stanford.edu/news/ncii-legislation-limitations>; for more about partnerships to prevent the use of bitcoin for child sexual abuse material see: <https://www.reuters.com/article/bitcoin-internet-sexcrimes/rpt-new-partnership-aims-to-clamp-down-on-use-of-bitcoin-for-child-porn-idUSL8N19S3GD>

³⁰ European Financial Coalition against Commercial Sexual Exploitation of Children Online, Commercial, Sexual Exploitation Online: A Strategic Assessment - prepared by the European Cybercrime Centre (EC3), Europol <http://www.europeanfinancialcoalition.eu/private10/images/document/5.pdf>

and International policy related to these topics as well as the limitations of existing policy approaches.

US

CSAM is federally illegal and encompasses all sexually explicit content with visual depiction of an actual minor under 18. Adult NCII is primarily covered under so-called “revenge porn” laws. 48 states (and D.C.) have “revenge porn” laws³¹; however, there is no federal “revenge porn” law and, thus, internet companies are not liable for sexual abuse material under the Communications Decency Act (Section 230). Section 230 states that “No provider or user of an interactive computer service shall be treated as the publisher or speaker of any information provided by another information content provider”.³² This section shields platforms against civil suits and state laws, but not federal charges.

DCMA protects copyrighted content and can be used to curb the dissemination of sexual abuse material. However, sexually explicit content taken by someone else would not fall under DCMA protection, as the subject of the media does not own the copyright.³³

Laws prohibiting voyeurism are rarely updated

to account for evolving technology affordances and thus may not apply to non-consensually obtained images (e.g., upskirt photos). Additionally, laws against stalking and harassment “often require showing that the NCII was part of a pattern of conduct intended to cause distress or harm”, which research shows covers a minority of NCII.³⁴

Finally, SESTA/FOSTA is an amendment passed in 2018 that modifies Section 230 (mentioned above), as well as the Trafficking Victims Protection Act (TVPA) and the Mann Act, in an attempt to increase liability for platforms that host content related to sex trafficking. While these new provisions have rarely been applied legally, they have had significant impacts on the policies of internet companies who wish to avoid any potential legal action. These impacts include changing terms of service to ban sex-workers and 18+ related content, which has included banning sexual education content such as LGBTQ+ educational content and preventing 18+ communities, even those gathering recreationally, from using platforms.³⁵

³¹ See the Cyber Civil Rights Initiative website for a list of the states and their template legislation: cybercivilrights.org/revenge-porn-laws/.

³² See [https://uscode.house.gov/view.xhtml?req=\(title:47%20section:230%20edition:prelim\)](https://uscode.house.gov/view.xhtml?req=(title:47%20section:230%20edition:prelim))

³³ See explanation provided by “My Adult Attorney”: <https://myadultattorney.com/proper-dmca-takedown-notification/>

³⁴ See the Cyber Civil Rights Initiative FAQ for more information: <https://www.cybercivilrights.org/faqs/>

³⁵ See Albert et al. “Fosta in legal context.” *Colum. Hum. Rts. L. Rev.* 52 (2020): 1084 (http://blogs.law.columbia.edu/hrlr/files/2021/04/1084_Albert.pdf) and “Enough About FOSTA’s “Unintended Consequences””: <https://kendraalbert.com/blog/2021/07/28/enough-about-fostas-unintended-consequences.html>.

International

There are no global policy standards for prosecuting nonconsensual distribution of sexual abuse material of adults and children alike. The various international interpretations of privacy, sexual abuse material, and consent give rise to a spectrum of approaches (or lack thereof) for children sexual abuse material (CSAM) and adult sexual abuse material respectively.

CSAM/CSEM

The leading international legal instrument that addresses CSAM material is the Optional Protocol to the (U.N.) Convention on the Rights of the Child on the Sale of Children, Child Prostitution and Child Pornography.³⁶ Additionally, the International Labour Organization (ILO) Convention Concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour also categorizes the use of children for the production of pornography as one of the worst forms of child labor.³⁷ Regarding CSEM, the

Council of Europe's Convention on Cybercrime and Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse specifically defines CSEM offenses.³⁸

118 countries have legislation to combat the distribution of CSAM as of 2018.³⁹ The consequences of CSAM distribution in these countries range in severity; for example Canada imposes 14 years imprisonment and India life imprisonment in some cases.⁴⁰ However, some countries that have legislation to combat CSAM do not define CSAM (51 countries), provide for technology-facilitated CSAM offenses (25 countries), or criminalize the possession of CSAM (38 countries).⁴¹ 16 countries have no legislation related to CSAM. In nations lacking legislation, such as Kenya, Chile, and South Africa, victims have sought justice through developing educational programs⁴² that promote the moral and legal boundaries of sexual abuse material and/or notifying platforms to remove or de-index a photo or video shared without consent.⁴³

³⁶ See the 2018 ICMEC report on Child Sexual Abuse Material <https://www.icmec.org/wp-content/uploads/2018/12/CSAM-Model-Law-9th-Ed-FINAL-12-3-18.pdf>

³⁷ See aforementioned ICMEC report on Child Sexual Abuse Material

³⁸ See aforementioned ICMEC report on Child Sexual Abuse Material

³⁹ See aforementioned ICMEC report on Child Sexual Abuse Material

⁴⁰ See the Internet Lab Law and Technology Research Center report "Fighting the Dissemination of Non-Consensual Intimate Images: a comparative analysis": https://www.internetlab.org.br/wp-content/uploads/2018/11/Fighting_the_Dissemination_of_Non.pdf.

⁴¹ See the 2018 ICMEC report on Child Sexual Abuse Material <https://www.icmec.org/wp-content/uploads/2018/12/CSAM-Model-Law-9th-Ed-FINAL-12-3-18.pdf>

⁴² See the Center for Internet & Society's report on international revenge porn: <https://cis-india.org/internet-governance/blog/revenge-porn-laws-across-the-world>

⁴³ See the Center for International Governance Innovations's report on non-consensual intimate image distribution in Kenya, Chile, and South Africa https://www.cigionline.org/static/documents/SaferInternet_Paper_no_2_SuBHPxy.pdf

Adult Sexual Abuse Material

Global policy standards for prosecuting nonconsensual distribution of adult sexual abuse material also referred to as the non-consensual intimate imagery (NCII) is less prevalent than global policy standards for CSAM.

Notably, global policy and legislative action tend to follow nationally publicized cases of nonconsensual distribution of sexual abuse material (e.g., United States, Canada, Israel, Japan, the Philippines, the United Kingdom and South Africa).⁴⁴ 38 countries have regulation or specific laws against NCII.⁴⁵ In nations without NCII-specific legislation, victims utilize laws related to privacy and data protection to obtain justice; however, there are significant gaps in these laws that may reinforce victim blaming.⁴⁶ Some nations that do not have NCII-related laws may perceive prosecuting nonconsensual distribution of sexual abuse material as an attack on individual privacy.⁴⁷ In these cases, victims tend to rely on the terms of service of the applications where NCII offenses occur. Further, some nations address NCII through “Anti-obscenity laws” that ban all sexual content and do not distinguish between perpetrator and victim.⁴⁸

Finally, in a uniquely far-reaching law, Australia has passed the Online Safety Act which establishes an eSafety office where reports of NCII content can be made. Within 24 hours, platforms are required to remove the content which will be stored in a centralized database that platforms can query to engage in continuous takedown of new uploads.⁴⁹ However, this regulation is quite broad and goes beyond reports of NCII/CSAM/CSEM to include “material offensive to a reasonable person” which could include 18+ community content such as pornography.⁵⁰ Additionally, the law does not extend to 18+ communities who have their content stolen.⁵¹

Limitations to Policy Approaches

Broad policy aimed at e.g., anti-sex-trafficking, protecting children, etc. frequently has far reaching negative implications such as deplatforming 18+ communities and sex-positive content, including educational content and communities through which young people may find support for their sexual identities and interests. Such policies increase stigma and also lead to reduction in the ability to form community in person, for example limiting the ability for people to find spaces willing

⁴⁴ See the Internet Lab Law and Technology Research Center report “Fighting the Dissemination of Non-Consensual Intimate Images: a comparative analysis”: https://www.internetlab.org.br/wp-content/uploads/2018/11/Fighting_the_Dissemination_of_Non.pdf.

⁴⁵ See the Internet Lab report on global NCII policies, <https://www.internetlab.org.br/en/inequalities-and-identities/how-do-countries-fight-the-non-consensual-dissemination-of-intimate-images/>

⁴⁶ Read Dunn and Petricone-Westwood’s paper, https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3772050

⁴⁷ See the Internet Lab Law and Technology Research Center report “Fighting the Dissemination of Non-Consensual Intimate Images: a comparative analysis”: https://www.internetlab.org.br/wp-content/uploads/2018/11/Fighting_the_Dissemination_of_Non.pdf.

⁴⁸ See <https://reputationdefender.medium.com/international-laws-on-revenge-porn-761e576f07ba>

⁴⁹ See https://www.aph.gov.au/Parliamentary_Business/Bills_Legislation/Bills_Search_Results/Result?bld=r6680.

⁵⁰ See <https://theconversation.com/a-new-online-safety-bill-could-allow-censorship-of-anyone-who-engages-with-sexual-content-on-the-internet-154739>

⁵¹ See <https://scarletalliance.org.au/library/online-safety-bill/>

to allow them to gather for in-person events. Such silencing of conversation can push people to alternative digital platforms that have few protections for harassment and harm, and those who cannot find community may experience negative health outcomes.⁵² Relatedly, anti-obscenity laws -- and CSAM laws that criminalize sharing of sexual content between minors -- mute distinctions around actual harm increasing victims' vulnerability and in some cases punishing them.⁵³

Even when good regulation is in place, societal values and stigmatization (especially if the victim is a member of an already-stigmatized group such as 18+ communities and LGBTQ people) may inhibit victims from taking legal action.⁵⁴ Further, in some countries, slow, bureaucratic, and corrupt legal systems can be a deterrent to victims, especially if they fear being prosecuted for e.g., 18+ communities.⁵⁵

Law Enforcement & Reporting

In the United States, technology companies are required to report instances of CSAM/CSEM (that they are aware of) to the National Center for Missing & Exploited Children (NCMEC).⁵⁶ The EU recently reauthorized tech companies to use scanning technologies to detect this

material in their users' communications. Under current arrangements reports of such material are voluntarily made to multiple European programs and hotlines that accept reports (e.g., the Internet Watch Foundation).⁵⁷ These reports are then transferred to the appropriate law enforcement authorities. New images are added to databases that can be consulted to identify known CSAM/CSEM (see the Industry section for more information).

The challenges in prosecuting CSAM/CSEM, based on reports, are two-fold. First, identifying victims of reported content proves to be a challenge.⁵⁸ Second, due to the large volume of reports received, law enforcement is forced to prioritize the most critical cases (frequency of reports, type of act depicted, age of child, likelihood of identifying producer and victim).⁵⁹

This law-enforcement based approach has significant limitations and risks harming children if their guardians victimize them for their CSAM/CSEM experiences. For example, LGBTQ youth who become involved with law enforcement may experience family-based violence, homelessness and other negative outcomes.⁶⁰

⁵² Tiidenberg, K., & van der Nagel, E. (2020). WHAT'S AT STAKE WHEN SEX IS DEPLATFORMED?. *AoIR Selected Papers of Internet Research*: <https://journals.uic.edu/ojs/index.php/spir/article/view/11348>.

⁵³ Read Hasinoff, A. A. (2015). *Sexting panic: Rethinking criminalization, privacy, and consent*. University of Illinois Press; For more information about CSAM/CSEM between minors, Dodge, A., & Spencer, D. C. (2018). Online sexual violence, child pornography or something else entirely? Police responses to non-consensual intimate image sharing among youth. *Social & Legal Studies*, 27(5), 636-657: <https://journals.sagepub.com/doi/abs/10.1177/0964663917724866>.

⁵⁴ See "International Laws on Revenge Porn": <https://reputationdefender.medium.com/international-laws-on-revenge-porn-761e576f07ba>

⁵⁵ See "Powell and Henry on Technology and Sexual Violence": <https://www.palgrave.com/gp/blogs/social-sciences/powell-and-henry-on-tech-and-sexual-violence>.

⁵⁶ See NCMEC's website: <https://www.missingkids.org/theissues/csam#whatncmecisdoingaboutit>.

⁵⁷ See <https://www.forbes.com/sites/emmawoollacott/2021/07/07/eu-passes-emergency-law-allowing-tech-companies-to-screen-messages-for-child-abuse>.

⁵⁸ See Interpol's discussion: <https://www.interpol.int/en/Crimes/Crimes-against-children/International-Child-Sexual-Exploitation-database>

⁵⁹ See <https://www.insider.com/revenge-porn-victims-and-the-law-2019-12>

⁶⁰ See the Human Rights Campaign report on violence against LGBTQ youth: <https://www.hrc.org/resources/supporting-safety-of-lgbtq-children-youth-risk-factors-of-child-abuse-negle>.

There is no obligatory reporting for adult sexual abuse material, nor is there a centralized database of material (except as proposed in the Australia Online Safety Act as discussed in the policy section, and existing fingerprinting databases maintained by third parties). Limitations to the prosecution of these incidents include lack of anonymity for victims (depending on how adult abuse content laws are implemented)⁶¹, victim-blaming by police⁶², and steep costs of digital forensic investigations⁶³.

⁶¹ See "'Is this you?!' How revenge porn victims are forced to deal with the incompetence of the police ": <https://www.insider.com/revenge-porn-victims-and-the-law-2019-12>.

⁶² Read Zvi, L., & Shechory-Bitton, M. (2020). Police officer perceptions of non-consensual dissemination of intimate images. *Frontiers in psychology*, 11, 2148: <https://www.frontiersin.org/articles/10.3389/fpsyg.2020.02148/full>.

⁶³ Read, Henry, N., Flynn, A., & Powell, A. (2018). Policing image-based sexual abuse: Stakeholder perspectives. *Police practice and research*, 19(6), 565-581: <https://www.tandfonline.com/doi/full/10.1080/15614263.2018.1507892>.

SEXUAL HEALTH, WELLBEING, AND PREVENTION

Cultural change has long been recognized as a key component of sexual abuse prevention over the long term. In the radical feminist framing that strongly influenced the early child protection lobby, abuse is a result of patriarchal social attitudes, which are reinforced by cultural representations of women and children as sexual objects.⁶⁴ This stance continues to supply the theoretical foundation of anti-pornography lobby groups such as NCOSE (the National Center on Sexual Exploitation, formerly Morality in Media), OBJECT, and Collective Shout, who seek to address exploitation by censoring representations of female and child sexual objectification such as clothing, toys, and advertising.

However liberal and sex-positive feminists challenge this approach, arguing that it harms, stigmatizes, and devalues female sexuality with particular impacts on minority communities.⁶⁵ Even in the case of child sexual abuse, which is universally condemned, the typical framing of child victims of being void of any sexuality of their own (or at most, possessing an immature and invalid proto-sexuality) has been criticized as contributing to the shame and trauma that they suffer in the aftermath of abuse.⁶⁶ In response, feminists and child protection groups who adopt a sex-positive approach reject the policing of most sexual desires, expressions, and representations, and instead promote consent culture as the main cultural shift that is required to reduce sexual abuse over the long term.

While these larger cultural arguments continue, proposed and existing strategies for prevention primarily focus on CSAM/CSEM and include platform-facilitated approaches, educational approaches, and potential perpetrator interventions.

Platform approaches. Approaches implemented by platforms may be targeted either at perpetrators or at victims. These approaches are strictly limited to CSAM/CSEM.

1. Keyword-based warnings or advertisements.

Warning pop ups informing the viewer that content they may be searching for is illegal. There is evidence⁶⁷ that the younger generation may not be aware of the ethical and legal implications of this content. Thus, keyword-based warnings or advertisements serve as both a reminder and an educational source. A limitation of these approaches is that keywords may target phrases such as “Lolita” that do not necessarily reference illegal content.

2. Child Protection tools. Tools such as a sex education Chatbot for Facebook Messenger⁶⁸ or Apple’s iMessage feature that will detect and report explicit content sent to youth under 13 to their parents depending on the settings on their Apple accounts⁶⁹. Limitations of these approaches include family violence and harm if children are reported to their parents and/or encouraging children to move to other, potentially less safe platforms on which to share content.

⁶⁴ See Dines, G. (2010). *Pornland: How porn has hijacked our sexuality*. Beacon Press.

⁶⁵ See Nagle, J. (Ed.). (1998). *Whores and Other Feminists*. Routledge.

⁶⁶ Angelides, S. (2019). *The fear of child sexuality: Young people, sex, and agency*. University of Chicago Press, ch. 3.

⁶⁷ See the We Protect Global Alliance 2019 report: <https://www.end-violence.org/sites/default/files/paragraphs/download/Global%20Threat%20Assessment%202019.pdf>

⁶⁸ See <https://www.thestar.com.my/news/nation/2018/04/30/chatbot-to-help-with-sex-education-programme-can-answer-queries-as-well-as-connect-children-to-suppo>

⁶⁹ See Apple’s summary of their child safety features announced in August 2021: <https://www.apple.com/child-safety/>

Educational approaches. A variety of educational approaches have been implemented in various contexts. Effective education requires a multi-stakeholder approach that relies not only on educators, but also on e.g., search engines enabling search optimization for trustworthy and appropriate content.⁷⁰ We summarize the primary educational categories below:

1. Consent education. This includes establishing and modeling behavioral norms such as: consent should be obtained prior to interaction with another person's body or space (e.g., giving a hug) and consent can be revoked at any time.⁷¹
2. Norms and values education. Frequently focused on combating expectations around gender roles, toxic masculinity, and violence in relationships.⁷²
3. Soft skills education such as emotions education.⁷³
4. Comprehensive sex education.⁴¹ Best practices include beginning such education at a young age such that children have appropriate words to describe their body and

interactions with it. Information should be age-appropriate, accessible and digestible. For older children this can include self-service education and support e.g., through mobile applications and partnerships with social media influencers⁷⁴ who address taboo topics and assist with sexual health education for various development stages.⁷⁵

5. Digital literacy education. This includes helping young people navigate valuable, informative, and trustworthy resources online. This can also be achieved with formal education courses⁷⁶, informational repositories⁷⁷, or informal educational resources (e.g., @askTia).⁷⁸
6. Online safety education.⁴¹ This typically includes abstinence-based educational approaches about not sharing sexual content or engaging with strangers online. Such abstinence-based approaches have been criticized as contributing to the stigmatization and shame around childhood sexuality.⁷⁹

Potential Perpetrator Interventions.

These interventions include hotlines, informational resources, and therapists through which

⁷⁰ See the UNICEF review report on "The Opportunity for Digital Sexuality Education in East Asia and the Pacific": <https://www.unicef.org/eap/media/3686/file/Digital.pdf>.

⁷¹ See an article from the Harvard Graduate School for Education for examples of how consent education can be implemented in age-appropriate ways: <https://www.gse.harvard.edu/news/uk/18/12/consent-every-age>. See the National Coalition for Sexual Freedom for a discussion of consent education in an adult context: <https://ncsfreedom.org/key-programs-2/consent-counts/>. See this article from The Conversation, a research-based news venue, on the role of consent education in preventing NCII: <https://theconversation.com/the-law-must-focus-on-consent-when-it-tackles-revenge-porn-29501>.

⁷² See the evidence report "What Works to Prevent Sexual Violence Against Children": <https://www.togetherforgirls.org/wp-content/uploads/2019-11-15-What-Works-to-Prevent-Sexual-Violence-Against-Children-Evidence-Review.pdf>. An example of such norms and values education targeted at adults includes the Pornhub Sexual Wellness Center: <https://www.pornhub.com/sex/>.

⁷³ See the aforementioned article from the Harvard Graduate School for Education³⁹ and the UNICEF report⁴⁰.

⁷⁴ See the UNICEF report describing the importance of a multi-stakeholder approach.³⁹

⁷⁵ Examples of apps include Juicebox, It Matters, and My Sex Doctor offer young people quick access to sexual and reproductive health information and services. Examples of sexual health influencers include Hannah Witton, Dr. Lindsey Doe, Shan Boody, and Natalia Trybus.

⁷⁶ See the Internet Health Report: <https://internethealthreport.org/2019/sex-ed-in-the-digital-age/>

⁷⁷ For example the Our Data Bodies project: <https://www.odbproject.org/>.

⁷⁸ See UNICEF's report on Digital Sexual Education in East Asia and the Pacific <https://www.unicef.org/eap/media/3686/file/Digital.pdf>

⁷⁹ See eg. Graling, K. (2013). The Use and Misuse of Pleasure in Sex Education Curricula. *Sex Education* 13, no 5 (2013): 305-18.

adults who are concerned about their own thoughts towards children, or about another adult's behavior, can obtain support. These must be targeted not only at adults, but also at children themselves, as over a third of perpetration of child sexual abuse is committed by other children.⁸⁰ Only a small subset of these, and about 27% of child sexual offenders overall,⁸¹ have a preferential sexual orientation towards prepubescent children (pedophilia). However for those that do, this attraction becomes evident at around 14.⁸²

Anonymous online support resources that are available to support prevention of abuse within this population include Stop it Now!, Help Wanted, and Talking for Change.⁸³ Links to some of these resources are provided by platforms as part of the keyword-based warnings described above. Research is also underway into whether those who would otherwise seek out CSAM can be redirected away from offending by the availability of victimless fictional or fantasy outlets.

Structural Interventions.

Research also suggests that broader societal changes are necessary to prevent CSAM/ CSEM such as robust social welfare programs, provision of trauma-informed, culturally sensitive support services for both children and caregivers⁸⁴, and training of law enforcement and support personnel to provide trauma-informed, culturally sensitive care.⁸⁵

Approaches to preventing adult non-consensual content are scarce. However, educational and structural approaches such as those listed above are also applicable and sometimes implemented (we note in the footnotes adult examples where applicable). Additionally, literature suggests that restorative and transformative justice strategies can be successful to combat in-person harassment and thus may be useful in the NCII context, as well.⁸⁶ Restorative and transformative justice practices both center on relationships and communication, typically through one-on-one meetings and small groups which often include the victim, the offender, and people connected to them. Typically, the group collectively develops a plan to repair the harm.

⁸⁰ Finkelhor, D., Ormrod, R., & Chaffin, M. (2009). Juveniles Who Commit Sex Offenses Against Minors. *Juvenile Justice Bulletin*.

⁸¹ Seto, M. C., & Lalumière, M. L. (2001). A brief screening scale to identify pedophilic interests among child molesters. *Sexual Abuse: A Journal of Research and Treatment*, 13(1), 15-25.

⁸² Bailey, J. M., Hsu, K. J., & Bernhard, P. A. (2016). An Internet study of men sexually attracted to children: Sexual attraction patterns. *Journal of Abnormal Psychology*, 125(7), 976.

⁸³ See <https://stopitnow.org>, <https://www.helpwantedprevention.org>, and <https://talkingforchange.ca>.

⁸⁴ See the UNICEF "INSPIRE" framework presented in the UNICEF report "What Works to Prevent Online and Offline Child Sexual Exploitation and Abuse": <https://www.unicef.org/eap/media/4706/file/What%20works.pdf>.

⁸⁵ For example, the Urban Justice Center - Sex Workers Project, for example, trains first responders, social workers, and other support personnel: <https://swp.urbanjustice.org/about/>.

⁸⁶ See this recent Brookings report on the potential of restorative and transformative justice approaches to addressing online harm: <https://www.brookings.edu/techstream/the-promise-of-restorative-justice-in-addressing-online-harm/>.

Provocations

In this section we offer an exercise, a series of case studies, and a summary of open questions for provoking new innovations to address non-consensual content. *Student Groups Experiencing a Significant Change From Participating*

WHERE DO WE GO FROM HERE?

Below, we summarize the existing strategies at each level of intervention: structural, legal/policy, industry/content moderation, and individual protective behaviors. What strategies could be added at each level? How could existing strategies be improved to best serve all communities?

Structural⁸⁷

- Educating the general population (e.g., consent education, comprehensive sex education, digital literacy education, norms and values, etc.)
- Educating support personnel (e.g., educating law enforcement, social workers on trauma-informed principles)

Legal/Policy

- DCMA takedown notices
- Cease and desist letters
- Non Disclosure Agreements (NDAs)
- Consent documentation / Model Releases
- Revenge Porn Regulation
- Anti-Obscenity Regulation
- CSAM/CSEM Regulation

Industry

- Integrating protective tools into platforms (e.g., chatbots for youth)
- Age verification of performers
- Manual review
- Keyword-based warnings or advertisements (e.g., on CSAM/CSEM-related keywords)
- User reporting of content or payments (including hotlines for underserved markets to report payments for abusive content)
- Known content databases / Content fingerprinting
- Mainstream search platforms (e.g., Google, Bing) de-indexing content
- Using AI systems to detect nudity

Individual

- Radio frequency, GPS, and/or magnetic field scanning devices.
- Anti-virus and anti-spyware apps
- Watermarking
- Use of end-to-end encrypted platforms for content sharing

⁸⁷ We omit deeper structural interventions such as robust welfare provisions.

THOUGHT EXPERIMENTS

18+ Communities

A new adult content hosting platform has come online and is trying to avoid needing to validate performers via government ID. Instead, they are using in-depth investigations of performer's personas (e.g., their Instagram, websites, correspondence with the platform, etc.) to do content ownership and age validation. They just received a report regarding a video that appears to show an underage Asian female performer. They conduct an in-depth investigation of the performer's persona and cannot find any images in which she does not look potentially underage, and her external profiles and media have only been active for a year. How should they resolve this issue?

Industry & Finance

A niche 18+ community is using the Dynamo platform to discuss their interests, share explicit content, and organize events. Dynamo allows them to control who can join their online community and also allows them to self-moderate. The community has three volunteer moderators who spend 10+ hours a week, each, moderating the community. Dynamo announces a new initiative in which they will provide a monthly stipend to moderators who are managing communities of a certain size. This community qualifies. However, if the moderators receive this stipend, Dynamo will require them to enforce a general set of rules, established by Dynamo, which would limit 18+ members from sharing certain fetish-themed content such as ageplay. Community members are unhappy: how should this be resolved?

Policy & Law Enforcement

An international governing body wants to establish a policy regarding NCII upon which

all member states can agree and that would be implemented in national law. They want to focus this policy on consent documentation and hope to ensure that no internet platform will allow content to be posted that does not have clearly documented consent. However, it is receiving pushback on both sides: from performers arguing that the policy infringes their privacy, and from anti-porn activists who argue that people may be coerced into giving their consent for having a piece of content of theirs distributed. How can these concerns be managed? Should member states push against a global policy or is such a policy still a good idea?

Sexual Health, Wellbeing & Prevention

People online dating, including minors, may share intimate images with each other as part of intimacy and/or as part of exploring their sexuality, especially in situations in which they lack comprehensive sexual education. Most dating platforms do not offer any proactive safety support such as affirmative language of consent, boundary education, etc.⁸⁸ Instead, dating platforms rely on retroactive interventions such as reporting of users or profiles, which in some cases have later been requested by law enforcement, raising significant concerns about due process and transparency.⁸⁹ What approaches could dating platforms implement to help facilitate consent conversations between users, both for the purposes of preventing NCII/CSAM/CSEM and for preventing sexual assault? What are risks to interventions implemented by dating platforms and how can these risks be mitigated?

⁸⁸ Some platforms require you to send a few messages back and forth before you can share a picture.

⁸⁹ See <https://theconversation.com/nsw-police-want-access-to-tinders-sexual-assault-data-cybersafety-experts-explain-why-its-a-date-with-disaster-159811>.

OPEN QUESTIONS

18+ Communities

- What are alternatives to age verification through legal ID that would allow 18+ communities to maintain anonymity?
- What mechanisms should be created or expanded for documenting and enforcing consent and chain of ownership in the context of content sharing? How could such mechanisms make clear the distinction between consent to a sex act and consent to recording?
- How can 18+ communities support prevention of non-consensual production of content e.g., through perpetrator identification, victim identification, while protecting community members' safety?

Industry & Finance

- How can we increase transparency between platforms and with the general public about: (1) how their content is being moderated, (2) what and (3) how much content is being flagged and removed?
- How might we design a unified mechanism for content takedown? What are the existing barriers to such an approach? What could mitigate them? What are the risks of a unified approach?
- How can unintended consequences of financial platforms targeting the payment of nonconsensual sexual abuse material or CSAM/CSEM on their platforms be mitigated (e.g., databases of actors / prevention via patterns may also catch legitimate 18+ communities' payments)?
- Can anything proactive (vs. reporting-based) be done to address adult abuse content? For example, keyword flagging?

Policy & Law Enforcement

- Legal alternatives outside of people's personal control (i.e., watermarking, NDA, issuing a Cease and Desist) can cause harm to those in the 18+ industry (e.g., FOSTA/SESTA): how does this interplay with proposed legislation against e.g., "revenge porn" that could theoretically assist 18+ folks in preventing NCII?
- In most countries that have specific laws or bills on the dissemination of non-consensual sexual images, they do not address the role of intermediaries (e.g., platforms, internet connection providers, website administrators, etc.) in the creation, possession, and dissemination of non-consensual sexual abuse material. What are the risks and benefits of extending laws to bridge this gap?
- How can self-moderation approaches (e.g., Tumblr formerly allowed marking of blogs as NSFW, Discord servers establish their own moderators and rules) be applied to address issues of non-consensual content? How can such approaches be scaled, financially supported, and integrated with existing platform-rule-based approaches?

Sexual Health, Wellbeing & Prevention

- What can be done to drive mainstream acceptance of sex-positive consent culture, in the face of powerful morality lobbies that conflate sexual expression with abuse?
- How can victim-blaming against adult NCII victims be mitigated?
- How can we ensure that platform attempts to eliminate CSAM do not also result in the censorship of information, support resources, and fantasy or fictional sexual outlets that may be helpful in abuse prevention?



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