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September 2021

Summary

This submission focuses on the need for revision to the Online Safety Bill to specifically include mandatory, robust Age Verification[1] on all pornography platforms, regardless of their functionality. This is prioritised given the strong reasons to believe it is absolutely crucial and urgent to curtail the completely unacceptable, massive costs to young people's safety, relationships and wellbeing that free online pornography is currently causing.

This submission has been kept concise (approximately 3,700 words, excluding references). I would **welcome the opportunity to give further evidence in an oral evidence session to the Committee on this issue, and other issues relevant to the Bill.** Related foci of mine include online corporate surveillance (and in particular its threat to people's, especially children's, autonomy and ability to live in line with prosocial values),[2] and the proliferation of child sexual abuse material online[3]. Beyond Age Verification, other measures that there are strong grounds for inserting into the Bill include:

- Making it illegal for platforms to show sexually explicit content without adequate proof that those in the material are over 18 and are consenting both to the filming and its sharing
- Making what is illegal to sell offline also illegal to show online (for example, videos containing bestiality or child-like actors, or that depicting non-consensual sex or sex between family members)

This submission briefly sets out the following:

- The nature of free online pornography and the prevalence of children drawn into it (e.g. 41% of free professional porn contains violence towards women; 51% of 11-13 year-olds have seen it)
- Findings of research studies on the impact of pornography on individuals, in particular children (including increasing sexual harassment and abuse, and reducing relationship health and prosocial behaviour) - for example, one study found viewing violent pornography increased adolescent sexual harassment by six times

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[1] I use this term to mean measures that prove that a user is of over 18 years old to a high level of confidence (for example, involving identification documents or credit card checks) – not the lower level 'age assurance' measures.

[2] See for example, https://fullyhuman.org.uk/issues/pornography/autonomy-and-self-determination#porn-and-the-autonomy-of-women-and-girls ; I also speak on this issue in a BBC Scotland documentary on the corporate online surveillance of children due to be shown at 19.30 on 4th October. I am a member of the End Surveillance Advertising to Kids coalition and am a signatory on that evidence submission to yourselves.

[3] See for example, https://www.researchgate.net/publication/337114034_'Losing_track_of_morality'_Understanding_online_forces_and_dynamics_conducive_to_child_sexual_exploitation and https://www.researchgate.net/publication/345717846_I_need_you_all_to_understand_how_pervasive_this_issue_is_User_efforts_to_regulate_child_sexual_offending_on_social_media

- Key omissions in the draft Bill that make it difficult to adequately regulate the online pornography industry (and other harmful commodity industries)
- Why Age Verification is a vital protection
- What failing to adequately protect our children with robust, effective measures really means, including how it comprises societal neglect and arguably abuse

Sexual harassment spotlight: We as a society are finally facing the scale of sexual harassment and abuse between young people – joining the dots between this, the prevalence of young people viewing pornography, and the longitudinal studies showing pornography's contribution to sexual harassment (as well as the nature of online pornography and the way it operates), it is absolutely clear that their exposure must be curtailed in order to prevent this life-limiting, traumatising, and rights-violating pattern of behaviour.

Who I am

I am a Clinical Psychologist and researcher with a focus on preventing and tackling abuse, and, more widely, supporting children's and young people's wellbeing and growth. My work has included a focus on online safety and harm since 2007, including a specific focus on the online pornography industry and its impact on young people since 2011. I was a member of the DCMS advisory group on Age Verification of online pornography, when this measure was being developed. Examples of my research and writing on these issues can be found here .

Another major focus of my attention is sexual harassment and abuse in schools. I work with schools and others in this space providing training, consultancy and research, helping them to tackle this endemic issue.

Children and free online pornography: the current situation

With the advance of online technology, and the libertarian approach that has largely been taken towards it,[4] we have gone from a situation in which children[5] were robustly protected from all sexually explicit content to one in which they are bombarded with its most 'hardcore' forms. I use 'hardcore' as a shorthand here for sex involving dominance, violence, bigotry, or transgression of ethical boundaries (that are usually upheld in other areas of social life).

As evidence of this, I share just a few salient facts and findings here. For much more evidence on what children are being exposed to and why, see:

- Recent BBFC research
- My report 'Pornography and human futures' for Fully Human, a new initiative of the PSHE Association, which maps out the business model and practices of the online porn industry and considers how it affects core parts of what it is to be human

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[4]https://www.researchgate.net/publication/337114034_'Losing_track_of_morality'_Understanding_online_forces_and_dynamics_conducive_to_child_sexual_exploitation

[5] In this submission I use the term 'children' to refer to all those under 18 years of age.

- Visit any one of the major porn platforms and you are bombarded with images and videos, flowing seemingly endlessly down the page. Videos serving as adverts for paid sites and services are bigger than others, and play without prompting in fast-forward. To give a flavour of this barrage, this was the content immediately seen on visits to PornHub on a random day[6]:

    - Large, playing video adverts including close-up footage of a girl's[7] anus being penetrated by a man's penis whilst she bends over on a car, and a middle-aged man coming up behind a girl opening a fridge in her underwear (seemingly looking for food) and then without warning immediately penetrating her from behind, her expression is one of shock

    - Numerous thumbnail images of films available to view upon clicking, below which are their keyworded titles such as [Titles redacted from published evidence – these refer to the ethnicity of people in the videos; a girl having sex in exchange for a phone; an 'amateur' girl being tested for anal sex ability; and those involving a daughter and stepdad (accompanied by picture of a girl in pigtails) and a mother]. Of the eleven first listed films, three involved 'step sisters'. The viewer is overwhelmed with close-up footage of female sexual body parts.

    - The menu bar at the top of the page lists options such as 'fuck now', 'live sex' and 'categories' (those listed on the page the latter leads to include 'teen', 'gangbangs' and 'bdsm'[8])

- In a content analysis of free online pornography, Klaassen and Peter (2015) found that 41% of professional videos depicted violence towards women. Women's responses to this violence were for the most part neutral or positive. Men dominating women were also common (39%), as were women being instrumentalized (i.e. used as a sexual object whose own sexual pleasure is not important). A concerning minority of films (between 10-19%) depicted non-consensual or manipulative sex.

- In a complementary analysis asking young people what they see when they view pornography, Davis et al. (2018) found that 70% frequently saw men portrayed as dominant (17% equivalent for women); 36% frequently saw women being slurred (7% equivalent for men); 35% frequently saw 'consensual' violence towards women (9% equivalent for men); and 11% frequently saw non-consensual violence towards women (1% equivalent for men).

- Pornography appears to be the only media genre in which overt racism is still routine and acceptable. Demeaning stereotypes of people of different ethnicities are promoted and sexualised. For example, one content analysis found that videos with Asian and Latina women were more likely to depict aggression than those involving white and

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[6] PornHub accessed from the UK on 28th September 2020. Note that this content is viewed immediately, within seconds, without clicking on anything on the site.

[7] The term 'girl' here is used to describe a female who looks young, teens or early twenties, and is most probably placed in the site's 'teen' category.

[8] BDSM (bondage, dominance and sadomasochism) pornography mostly comprises violent or dominating sex, with men usually in the dominant position. Themes of humiliation and degradation are common. Not readily visible within BDSM porn are the themes of consent, safety and trust that many who practice BDSM in real life would see as central.

black women (Shor & Golriz, 2019). Another found black men more often portrayed as perpetrators of aggression than white men, and black women more often targets of aggression than white women (Fritz et al., 2020).

- More generally speaking, viewers are told in lots of different ways that the principles of respect, empathy, and valuing one another that we are expected to hold to in everyday life, don't apply when it comes to sex.

- They are invited to dissociate: to dissociate people's bodies from the rest of who they are; to dissociate from the real feelings and agency of those people; and furthermore they are asked to dissociate parts of themselves – to split their sexual arousal from other parts of who they are and all the other interweaving strands of what their sexuality could comprise.

- None of this design and content is accidental. Porn platforms *and the surveillance technologies they employ* are tightly geared towards their business model – in short, the aim is to shape viewers' sexual interests (and other parts of who they are, such as their values) towards those that profit the online porn industry. People are shaped away from their best interests towards those of the industry. It is more difficult for the porn industry to monetize sex that foregrounds relational connection and chemistry and so this sexuality is side-lined, and in its place, inequality, sexism, violence, transgression and racism are promoted.

  See here for a full account of how this business model works.

- Very large numbers of children are viewing pornography routinely, whilst adults typically under-estimate this prevalence. A recent, large and representative survey of children by the BBFC (2020) found that, for example, 51% of 11-13 year olds have seen pornography (most of them unintentionally) and 18% have done so in the last two weeks. As expected, numbers and intentionality increase over adolescence.

- It's important we clearly name what this means. For a huge proportion of children today, their first explorations of sex and sexuality involve being bombarded with explicit footage of sex that is violent and misogynistic whilst also geared to be highly arousing. This is causing significant harm (see next section) and is a complete violation of their rights to protection. Young people should have the protection and opportunities to author a sexuality rooted in respect, intimacy and connection.

Research on the harms of pornography on children and young people

A wealth of research comes together to reveal the significant harms that online pornography is causing to children and young people, as well as to adults. Please see my concise (3½ page) summary of this research, published last summer by the PSHE Association, and much more on its impact is contained within my Pornography & human futures report referenced above.

A few particularly salient findings are highlighted here:

- **Sexual harassment and abuse.** This is rife between young people in the UK today, as was brought to society's attention by Everyone's Invited and the revelations and research that followed (for example, OFSTED, 2021). This can be no surprise when we

consider the prevalence of exposure to pornography; its content, operations and messages; and the research that, joining the dots, finds direct links between the two. Longitudinal controlled studies following adolescents or young adults over time tend to find that pornography consumption predicts subsequent sexually aggressive behaviour.[9] For example Ybarra et al. (2011) found that, after controlling for other relevant factors, adolescent violent pornography use increased the risk of subsequent sexual aggression by nearly six times.

Young people themselves frequently make this link – for example see Coy et al. (2013), and in the BBFC (2020) survey cited, 41% of children surveyed who were aware of pornography agreed that *'watching porn makes people less respectful of the opposite sex'*.

A large part of my work is supporting schools in tackling sexual harassment, and developing effective educational resources to support young people in developing healthy relationships. Despite this being a passion of mine, I am acutely aware of its limitations. In the face of online porn powerfully promoting abusive attitudes and behaviour, what we can offer young people honestly feels like a drop in the ocean. The lion's share of responsibility for tackling the problem seems to be placed on schools' shoulders (and on other things like intervention programmes for young people with harmful sexual behaviour), without due attention to its powerful, upstream causes. The old adage that an ounce of prevention is worth a pound of cure is highly relevant here.

- **Antisocial attitudes and perceptions**. For example, research indicates that pornography increases people's tendency to objectify women (e.g. Wright & Tokunaga, 2016; Peter & Valkenburg, 2009a), and that when people objectify others, they perceive them as having less of a mind, and being less competent, less sensitive to pain and/or less deserving of moral treatment (Loughnam et al., 2010). In turn, various actions that hurt and harm them can be viewed as acceptable, or indeed logical. Thus it is no surprise that research also finds that pornography use seems to increases permissive attitudes towards sexual coercion and aggression (see Rodenhizer & Edwards, 2019).

- **Nudging people away from prosocial values.** See here for a research-based analysis of how this works. In short, research finds that if selfish values are sold to us, or we are told that they are what other people think are important (both of which pornography does), we tend to move towards those values and away from those that are more prosocial. In keeping with this, research finds pornography use increases unethical behaviour, such as lying (for example Mecham et al., 2019).

- **Risky sexual practices.** The findings of a further set of longitudinal studies suggest that adolescent pornography use can increase engagement in risky sex (for example, condomless sex) and casual sex (Koletic et al., 2019; Vandenbosch & van Oosten, 2018).

- **Academic achievement.** Beyens et al. (2015) found that pornography use over time reduced adolescents' academic performance. This may be due to it increasing sexual preoccupation (Peter & Valkenburg, 2008). Whilst the jury remains out on this potential impact at present, a precautionary approach is surely warranted.

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[9] Brown & L'Engle, 2009; D'Abreu & Krahe, 2014; Dawson et al., 2019; Thompson & Morrison, 2013; Tomaszewska & Krahe, 2018; Ybarra et al., 2011; Ybarra & Thompson, 2018

- **Relational, body and sexual dissatisfaction, and relationship breakdown.** Several longitudinal studies have found that adolescents' pornography consumption is associated with subsequent increased sexual, relational and body dissatisfaction.[10] Chiming with this, the BBFC survey found that 35% of the children and young people who had seen porn and gave an opinion, agreed that *'I worry about what other people think of my body because I don't look like the actors you see in porn'*. A meta-analysis drawing on both studies with adolescent and adult participants (Wright et al., 2017) found that pornography is associated with lower interpersonal satisfaction in males and that this link is highly likely to be causal. Longitudinal and meta-analytic studies also find a role for pornography in relationship break-ups. For example, Perry (2018) found that married individuals who viewed porn in 2006 were more than twice as likely to be separated by 2012 than others, even after controlling for baseline marital happiness and sexual satisfaction.

Omissions and inadequacies in the draft Bill

Some argue that clauses within the current draft of the Online Safety Bill will necessarily lead to pornography platforms bringing in Age Verification. However there are reasons to fear that this will not be the case across all or even the majority of pornography platforms, and, given the scale of harms to the most vulnerable in society, any risk that wholescale implementation of Age Verification will not take place is wholly unacceptable. It is already a tragedy that a whole generation of children have had their right to develop a sexuality rooted in intimacy, respect and connection violated (alongside all the associated harms), and there can be no risk of anything but robust protection of those growing up behind them. There can be no risk that we again fail to protect our children, and no margin of error or doubt which online pornography companies seek to leverage and manoeuvre within.

The current draft of the Online Safety Bill is inadequate in:

- **Not recognising, and therefore not addressing appropriately, the particular case of online pornography**: it's intentions, content and strategies, and the extent and nature of its harms. Online pornography comprises a huge public health issue, and yet <u>enjoys a lack of regulation that would never be countenanced for other 'unhealthy commodity industries'</u>, such as those of alcohol, tobacco and gambling. As laid out below, Age Verification is a crucial specific measure within the wider regulatory regime required.

- Restricting regulation to platforms involving search or user-to-user functionality. I envisage several ways pornography platforms could easily change how they operate to remove explicit user-to-user functionality whilst retaining all of their problematic features, and **thus escape regulation via the current bill**.

- **Allowing companies to assess their own risk and come up with solutions to address it themselves**. Whilst marking their own homework might work for those companies with good intentions, this is the polar opposite of what is required for the online pornography industry, which has shown itself to be reliably opposed to curtailing the harms it causes (not just to viewers and those around them, but also towards those whose abuse videos they promote[11] and those whose copyrights their business

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[10] Peter & Valkenburg, 2009b; Peter & Valkenburg, 2014; Doornward et al., 2014

model has been based on violating[12]). Indeed its current business model necessitates actively working against the interests of individuals and society, most problematically against children. It has every incentive to minimise and hide its risks when conducting any risk assessment, and one way it is likely to do so is through **the use of 'complexity arguments', a well-worn and disappointingly effective tactic used by a diversity of unhealthy commodity industries** (Petticrew et al., 2017). In short this involves the misuse and misrepresentation of the scientific process to manufacture uncertainty about the risks at play.

- On a related note, not recognising that some online industries are inherently high risk and harmful – their commodities are public health issues. **These industries (obviously including pornography) should be clearly named in the bill,** meaning that in these cases, individual risk assessments are not required for various restrictions and regulations to be applied to them. As noted above, individual risk assessments *risk missing the risk* and beyond that, they are superfluous, adding unnecessary process, time, money and bureaucracy to the duties of regulators that need to be able to move swiftly and with force.

- Not recognising harms to people beyond direct users. As noted online pornography carries **significant risk not just to its users but to various other groups**. To name but two examples: it contributes to gender inequality across society, and reduces the wellbeing and confidence of girls in relationship with young men using it. The distress and tragedy of undermined relationships and self-esteem cannot be under-estimated.

Final points including specifics on Age Verification

How we raise children in our society is meant to be governed by the principle of their best interests. The way in which we have left the online porn industry to run rampant in their lives is a complete dereliction of duty. We have a fantastic opportunity with the Online Safety Bill to right this wrong, putting the interests of children before those of the porn industry. There must be no risk that this opportunity is missed; there must be no wriggle room for the industry.

Some argue that Age Verification is a blunt tool and will be ineffective, for example by pushing adolescents to seek pornography on the dark web. These arguments were aired when Age Verification was first debated and the conclusion of the UK government then (as it should be now) was that on balance, it would be protective. The decision at a later point to delay or stop Age Verification (it was unclear which) was without good rationale and does not appear to have been because evidence of its likely ineffectiveness came to light.

There is widespread concern that instead this decision was due to certain voices being louder than children's, and certain interests being pursued above theirs. **I would welcome the opportunity to speak on the potential impacts of Age Verification at an oral evidence session**. In short, a wealth of research, in particular in the field of public health, evidences the intuitive fact that when you make something harder for people to do, fewer people do it. Age Verification provides a vital, necessary 'bump in the road', and in doing so also

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[11] See for example https://www.nytimes.com/2020/12/04/opinion/sunday/pornhub-rape-trafficking.html

[12] See for example https://www.theatlantic.com/business/archive/2016/04/pornography-industry-economics-tarrant/476580/

communicates to children and young people that we as a society do not accept pornography as normative, safe or 'neutral' for them to view. Children and young people, consciously and unconsciously, constantly look to adults for guidance around where the lines between safety and risk lie.

On a personal note, I first started researching the impact of pornography in 2011 (this was within a role I held at CEOP, the child exploitation and online protection centre, now part of the National Crime Agency). At this point my eldest child, my son, was one years old. As I became increasingly concerned by what I was reading, when it came to my own children I reassured myself that by the time they reached the tweens and teens, robust regulation would be in place – this being so clearly necessary and part of our duty of care. But now my son has just started secondary school and yet still no regulation is in place, so it is likely that soon he will be exposed to this toxic material despite my best efforts as a parent to protect him. Indeed I have had parents of his friends start to disclose to me (as their children hit the age at which first exposure tends to occur) the distress, trauma and confusion experienced by their children unexpectedly coming across it. Every day and every week children are being inculcated into the dystopian world and values of online pornography, with insidious effects on their lives, now and into the future.

The UK Government's statutory safeguarding guidance (Working Together, 2018) includes within its definition of child sexual abuse, *'non-contact activities such as involving children looking at, or in the production of, sexual images'*. And therefore, at present, children's exposure to bombarding and extreme sexually explicit material without any attempts to protect them by government constitutes their abuse and neglect by us as a society.

3 November 2021

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