

Written evidence submitted by The Children's Society (OSB85)

Submission to the Public Bill Committee on the Online Safety Bill

1. Overview

1.1 The Children's Society supports the Government's ambition to make the UK the safest place in the world for a child to go online. This legislation represents a powerful opportunity to transform the digital world and enshrine protections for children online. However, we believe that the Bill must be strengthened if it is to realise the Government's mission and meet its commitment to children and parents to give young people the long overdue protections that are so desperately needed.

2. About The Children's Society

2.1 The Children's Society's work transforms the lives of vulnerable children and young people facing abuse, exploitation, and neglect across the country. We provide specialist support that empowers young people to make positive changes. Through The Children's Society's services and projects, including its Prevention Programme, The Children's Society directly supports thousands of children and their families each year. In particular, we hold expertise in supporting children who are victims of child criminal exploitation (CCE), which often starts through children being groomed online.

3. The problem of online grooming for criminal exploitation

3.1 Child criminal exploitation is defined in the statutory Working Together guidance as a situation '*where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology.*'

3.2 There is no definition of child criminal exploitation for criminal law purposes. Instead, individuals who are exploiting children criminally, for example through the County Lines model of criminal exploitation, may be prosecuted under the Modern Slavery Act 2015 for slavery, servitude and forced and compulsory labour offences and trafficking for the purposes of exploitation offence. In these cases exploitation means "*Slavery, servitude and forced or compulsory labour, Sexual exploitation, Removal of organs etc, Securing services etc by force, threats or deception and Securing services etc from children and vulnerable persons.*"

3.3 The true scale of child criminal exploitation is not known. Since the introduction of the Modern Slavery Act 2015 around 21,000 children have been referred to the National Referral Mechanism – a framework for identifying victims of modern slavery, exploitation and trafficking – as suspected victims of all forms of sexual or criminal exploitation. Yet according to the Office for National Statistics, there have only been 186 prosecutions under the Modern Slavery Act 2015 where children were victims – and only half of them were successful.¹ The number of children who are exploited criminally is likely to be much higher as children find it difficult to disclose their experiences to professionals out of fear of perpetrators or of not being believed, due to earlier negative experiences with police or social care. Evidential difficulties is often cited as the key reason for the low number of prosecutions of cases of child criminal exploitation.

¹ [Child victims of modern slavery in the UK: March 2022 - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk/people-in-the-uk/population-and-demography/children-and-young-people/child-victims-of-modern-slavery-in-the-uk)

3.4 Children can be groomed and coerced and threatened into criminal exploitation online as the case study below from police explains. The BBC has also reported on how young people are groomed online by criminal groups into criminal activity related to drug distribution.²

3.5 Case study from police about criminal exploitation of children as a result of online grooming

3.6 Two young people aged 16 were reported as missing from their homes in West Midlands area. They were assessed by police as high risk missing persons due to their age and vulnerability. The checks on their phones' locations showed that they were both located in the same area in Eastern region in Essex, around 180 miles from their home.

3.7 As a result of co-ordinated activity between the police forces in 2 areas and the British Transport police, the 2 young people were eventually found at the train station in London. At the time they were found they had in their possession a large quantity of what appeared to be Crack/Cocaine and young people were therefore arrested for Possession with intent to supply of Class A drug. On arrest, both young people had their phones seized and reports compiled.

3.8 As a result of the police investigation during the missing episode and following the arrest, it was established that prior to going missing both young people were contacted on Snapchat by 3 unnamed males. There were numerous contacts that turned threatening when the young people were ordered by the unnamed males to collect a package with drugs from one location and to deliver it to the location in the Eastern region to distribute. Threats were made by the unnamed males in relation to the young people and in relation to their families if the young people would not comply. The messages insinuated that the males knew the location of the family of one young person.

3.9 When the young persons came into contact with the males following the instructions received one of them was also physically assaulted.

3.10 As a result of investigation one of the males who groomed and exploited the young people was arrested on human trafficking charges. Information located on seized phones allows for victimless prosecution that does not rely on disclosure and evidence from the exploited young people.

3.11 The scale of young people being groomed online into criminal exploitation is not known and the issue is not as well documented and researched as the issue of grooming of children online for sexual abuse. Yet, the research in 2019 showed that one in four young people (24%) reported that they see illicit drugs advertised for sale on social media – a significant figure considering how recent a phenomenon this is. The research notes that these platforms provide opportunities for dealers to build trust with potential customers, with young people highlighting that they are more likely to see an account advertising drugs as a 'friend', rather than as a 'dealer'. This can leave young people vulnerable to exploitation, as well as reduce any trepidations they may have around buying drugs. The ethnographic trawl revealed that dealers can advertise their associated lifestyles to their social media networks, for example, by posting pictures of luxury items and cash – a technique that can be used to

² [County lines gang 'recruited teen in 80 minutes via Snapchat' - BBC News](#)

[Snapchat drug dealers target Middlesbrough children - BBC News](#)

recruit and control victims. There are reports that social media is changing how the county lines model operates as there is no longer the need to transport children from cities to rural areas to sell drugs, since children who live in those rural areas can be groomed using social media.³

3.12 The research suggests that a range of digital platforms may be used to target young people for recruitment and digital technologies are being used to monitor their whereabouts during drug running episodes and online banking for money laundering purposes.

3.13 Children under the age of 18 are often contacted through online gaming platforms or social media platforms by perpetrators. Research highlights the role of '*remote mothering and online collateral*' on smart phones and social media as well as through popular culture in criminal exploitation of children.

- **“Remote mothering”**: the ability to monitor where someone is, what they are doing, and who they are with at all times via locations tags, GPS tracking, pictures and video calling.
- **“Online collateral”**: the use of incriminating images, videos, screen shots of messages, and voice notes to ensure compliance, especially among subordinate gang members and girls.

3.14 The '**Going Viral**' and '**Going Country**' research⁴ also found evidence that older gang members were grooming younger boys for participation in instrumental gang activities, initiating contact then outsourcing tasks and errands via social media that got progressively more difficult or risky. During their focus groups, for example, young people showed WhatsApp instant message that invited recipients to 'call if you want to make some money,' connected to an image of a pile of cash. Calling the number listed 'links you up with someone who will help you start shotting (selling drugs)', explained one boy (Male, 13, Group 12). Obviously, the gang already knew the recipient(s) because they had his or her telephone number, but in light of the 'quasi-celebrity' status gang members occupied in the community, the excitement young people felt in receiving an invite such as this was palpable. The researchers found similar messages and memes on Twitter and even a profile picture on YouTube that doubled as an advertisement for making 'quick and easy money' from drug dealing. Gangs monitor online spaces much like physical territory, for instance, ensuring taunts or acts of disrespect are responded to without losing face. During their focus groups, for example, young people showed WhatsApp instant message that invited recipients to 'call if you want to make some money,' connected to an image of a pile of cash. Calling the number listed 'links you up with someone who will help you start shotting (selling drugs)', explained one boy (Male, 13, Group 12). Obviously, the gang already knew the recipient(s) because they had his or her telephone number, but in light of the 'quasi-celebrity' status gang members occupied in the community, the excitement young people felt in receiving an invite such as this was palpable.

3.15 Practitioners at The Children's Society also report seeing in practice how children are groomed online for criminal exploitation. During the first and second wave of the Covid 19 pandemic The Children's Society's practitioners reported a notable increase in CCE perpetrators grooming children through social media sites and gaming sites. In the context of CCE, young people are often contacted by individuals or in a group context with 'promotional

³ Volteface (2019) DM for Details: Selling Drugs in the Age of Social Media accessed on 6 June 2022 [DM-for-Details-1-5-2.pdf](#) ([volteface.me](#))

⁴ Storrod, M. & Densley, J. 2017. 'Going viral' and 'Going country': The expressive and instrumental activities of street gangs on social media. *Journal of Youth Studies* 20: 677–696.

material' about lifestyles they could lead and advantages of 'working' within a gang. Children are then asked to do 'jobs' in exchange for money or status with this new group.

3.16 Our practitioners in our Prevention Programme shared anecdotal examples of organised groups running virtual 'recruitment' campaigns grooming children for criminal exploitation. As one of our practitioners in The Children's Society's Prevention Programme said:

"Within my 121 work with young people, I have first-hand seen the impact that the online world has on their lives. As a result of the advanced world of technology and as a result of COVID, young people are now spending more time online as they ever did before which has made it easier than ever for perpetrators to make contact with young people."

Practitioner, The Children's Society's Prevention Programme

4. How the Bill could be strengthened

4.1 The Online Safety Bill is an opportunity to strengthen legislation on online grooming for the purpose of children criminal exploitation, addressing existing gaps and ensuring that children are properly protected. It should also make it easier for evidence of children being groomed online for criminal exploitation, which is a form of modern slavery, to be shared between the platforms and the police to enable victimless prosecution and action against the perpetrators that do not require a disclosure from child victims.

4.2 The Children's Society would recommend that the Bill includes specific provisions to address and tackle online grooming and child criminal exploitation online, including that online platforms monitor and report on activity that relates to grooming of children for the purposes of exploitation and trafficking as defined in the Modern Slavery Act 2015, act to prevent children being exploited criminally as well as sexually, and share information with the police where risk of CCE has been detected.

4.3 The Children's Society also supports the NSPCC, 5Rights Foundation and the Children's Charities' Coalition on Internet Safety's calls to ensure the Bill provides the strongest possible response to detect and disrupt preventable online abuse by:

- Addressing child abuse that is facilitated on online services but does not meet the criminal threshold ('child abuse breadcrumbing');
- Imposing a duty on platforms to tackle the cross-platform nature of harm, and to address cross-platform risk when meeting safety and risk assessment duties;
- Giving Ofcom the power to require the proactive use of technology to detect CSEA in codes of practice.

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