**Plan International, Inc.**

**SUBMISSION TO THE SPECIAL RAPPORTEUR ON THE SALE AND SEXUAL EXPLOITATION OF CHILDREN**

Geneva, May 2024

Plan International has developed this submission to inform the Special Rapporteur's report on the sale and sexual exploitation of children, to inform her forthcoming report to the 79th session of the UN General Assembly in October 2024.

[Plan International](https://plan-international.org/), Inc. is an independent non-governmental organisation and is in General Consultative Status with ECOSOC. Plan International strives to advance children’s rights and equality for girls in both development and humanitarian contexts. Working with children and young people in more than 75 countries around the world, it tackles the root causes of inequality faced by children, especially girls.

As requested, below is Plan International’s submission responding to key questions related to the existing and emerging threats that digital technologies pose to children and the role that digital technology can play in responding to the diverse manifestations of sexual exploitation and sexual abuse of children online.

1. **How technologies are used to facilitate the sexual exploitation and abuse of children.**

Internet use is on the rise and social media platforms provide ever increasing ways of staying connected. Today, children spend an increasing amount of time online and in virtual spaces. UNICEF has estimated that at the global level “one child in three is an internet user, and that one in three internet users is a child under 18 years of age”[[1]](#footnote-1). In addition, Plan International surveyed 14,000 girls and young women across 31 countries and found that 98% of them use social media, 64% can be classified as having a high level of social media usage and 23% a medium level.[[2]](#footnote-2)

Advances in information and communication technology present new and positive opportunities to children. The internet, social media and other digital apps/platforms provide important spaces for learning, interaction and activism, as well as a platform for positively exploring sexuality and fostering relationships between children.[[3]](#footnote-3) Research from Plan International[[4]](#footnote-4) has found that children are enthusiastic about the educational opportunities and greater access that technology provides for speaking out, sharing information, communicating with family and friends, recreation and accessing news and current affairs.

However, at the same time, the online world has been increasingly recognised as a platform where children experience violence, exploitation and abuse. Children and young people, especially girls and young women, are susceptible to experience several types of abuse online, including bullying, harassment, emotional abuse, sexting, sexual abuse, sexual exploitation, and grooming.[[5]](#footnote-5)

The precise number of children who are victims of online child sexual exploitation is unknown as it is likely to be vastly underreported. The ease with which perpetrators can access potential victims is notably enhanced by digital platforms such as social media, chat rooms, and online gaming environments. These venues allow for anonymous interactions, where malicious actors can engage with children under concealed identities. These digital interactions can start innocently and gradually evolve into manipulative relationships, where children are coerced into exploitative situations without the immediate risk of the perpetrator being identified.

The anonymity of perpetrators is further facilitated by technologies that offer encrypted communications and anonymous profiles. While these technologies are designed to protect user privacy, they also shield criminal activities, making it difficult for law enforcement to trace illegal actions back to their source. This protective veil of anonymity is particularly troubling when considering that girls and young women are often the primary targets of such exploitation, with their images and videos disproportionately represented and shared in illegal online forums.

Indeed, girls account for the majority of victims of child abuse and exploitation, accounting for 90% of those featured in online child abuse materials[[6]](#footnote-6), although boys are increasingly at risk as well. The internet also simplifies the distribution and accessibility of exploitative content, with illegal images and videos being rapidly shared worldwide. Peer-to-peer networks, file-sharing sites, and encrypted messaging apps can spread such material quickly, often bypassing conventional monitoring systems. Girls frequently become the subjects of this content, their exploitation commercialised and consumed on a global scale, perpetuating a cycle of abuse and re-victimisation.

The WeProtect Global Threat Assessment 2023[[7]](#footnote-7) has shown that given the rapid advances of technology, new trends have started to emerge, namely financial sexual extortion, while threats such as online Grooming or child ‘self-generated’ sexual material continue to grow. Even the FBI released a warning on the “huge increase in the number of cases involving children and teens being threatened and coerced into sending explicit images online—a crime called sextortion”[[8]](#footnote-8).

The Committee on the Elimination of Discrimination against Women has warned that women and girls continue to be the most common victims of trafficking across the world and that State parties face a rise in trafficking in cyberspace, including increases in recruitment for sexual exploitation online, in demand for child sexual abuse material and technology-facilitated child sex trafficking.[[9]](#footnote-9) Some girls and young women are particularly exposed, such as women’s rights defenders, journalists, bloggers, video gamers, public figures and politicians. Evidence from other resources suggests that online abuse reduces women’s and girls’ ambition to be politically active and run for elections, interfering with their right to participate in public affairs.[[10]](#footnote-10) Online violence is a significant barrier to the full realisation of gender equality and violates girls and young women’s rights.

Plan International’s *Free to be Online* research, explored the experiences of girls and young women online, found that of the 14,000 girls and adolescents interviewed, more than half had been abused and harassed, mostly sexual in nature, on social media[[11]](#footnote-11). Social media platforms’ inadequate mechanisms for reporting inappropriate behaviour were highlighted for their role in allowing harassment to go unaddressed.[[12]](#footnote-12) In addition, 50% of the girls surveyed reported they face more online harassment than street harassment and 42% of girls expressed that online harassment resulted in them having lower self-esteem or losing confidence and experiencing mental or emotional stress, implicating harm to their wellbeing and the right to health. Nearly a quarter of them expressed they felt physically unsafe because of online abuse, and others said they have problems at school, with friends or family and in finding or keeping a job, because of the violence they had experienced online. Online abuse and harassment also result in girls' and young women’s voices being silenced, as 18 % of girls who face frequent harassment, told Plan International that they stopped posting content and expressing their opinions online. 16% also changed the way they express themselves to avoid harassment.[[13]](#footnote-13) This indicates that online abuse and harassment have a chilling effect on girls and young women’s freedom of expression.

Online violence is a continuation of offline violence. It is driven by the same harmful gender and social norms that continue to cause girls and women to experience violence offline and enable perpetrators to target girls when they consider them to be acting outside of what is considered acceptable behaviour.[[14]](#footnote-14) Girls who are Black, from an ethnic or religious minority, have a disability, identify as LGBTIQ+ or are outspoken, particularly about feminism or equal rights, are at increased risk.

Yet, despite girls moving increasingly online, the increase in access to the internet and social media has not been coupled with strong measures to protect them from abuse and keep them safe online. The few reporting mechanisms existing in social media apps are not widely shared and are ineffective in identifying perpetrators, as many of them use fake accounts. Moreover, in many cases when girls try to report, they do not receive adequate responses to their complaints. Girls and young women interviewed for the “Free to Be Online” research felt that social media companies are not really interested in preventing abuse. This situation is likely to worsen in the Virtual Reality world. Research by the Centre for Countering Digital Hate (CCDH), has flagged that in the Facebook Metaverse, there is one incident of abuse and harassment every seven minutes, and although many of these cases have been reported to Facebook, they have remained unaddressed and unanswered.[[15]](#footnote-15)

Addressing the digital exploitation of children, particularly the heightened risks faced by girls and young women, requires a multifaceted and gender-sensitive approach. This includes not only educating children and caregivers about safe online practices and the specific risks faced by girls but also strengthening legal frameworks to protect them, developing technology to detect and prevent exploitation, and enhancing international cooperation to address this pervasive issue effectively.[[16]](#footnote-16)

Online violence is a global public health and a human rights issue which affects girls’ safety and wellbeing. This must be understood and recognised by stakeholders across the online community and those engaging in work on gender-based violence (GBV) and violence against children (VAC). Gender inequality and harmful gender norms are merely replicated online, so until we tackle online violence, we cannot make holistic progress on ensuring all girls and women are safe from GBV.

1. **What are the remaining gaps that limit the effective implementation and application of existing laws, policies and guidelines to prevent, detect, report and protect children from sexual exploitation and sexual abuse online?**

Addressing the issue of online child sexual exploitation and abuse involves a complex interplay of laws, policies, and guidelines. Despite significant progress in some areas, substantial gaps remain that limit the effective implementation and application of these measures. Here are some of the most pressing gaps:

* **Technological Advancements Outpacing Legal Frameworks**

One of the most significant challenges is the rapid pace of technological advancement, which often outpaces existing legal frameworks. New platforms, applications, and technologies emerge regularly, each with new ways of interacting and new risks. Laws and regulations frequently lag, creating loopholes that perpetrators can exploit. This lag makes it difficult for law enforcement and legal systems to remain effective against new methods of abuse and exploitation.

* **Lack of Harmonisation Across Jurisdictions**

Online child sexual exploitation and abuse is a global issue, yet there is a significant lack of harmonisation in laws and policies across different jurisdictions. This disparity allows perpetrators to exploit jurisdictional loopholes, committing offences in regions with less stringent laws or where enforcement is weaker. International cooperation and harmonisation of laws are crucial to close these gaps and ensure consistent protection for children across borders.

* **Insufficient Resources for Enforcement and Implementation**

Many countries face resource constraints, which affect their ability to effectively enforce laws and implement policies. This includes limitations in funding, manpower, and technical expertise within law enforcement agencies. The lack of trained personnel who are equipped to handle the complexities of online crimes often results in inadequate investigation and prosecution of offenders. There are also limited dedicated law enforcement units; a UNICEF study in Low and Middle-Income Countries (LMICs) found that “very few countries have set up dedicated units responsible for the investigation of child sexual exploitation and abuse, including online child sexual exploitation and abuse. Yet, even in these units, the extent to which child protection professionals are systematically involved is unclear”[[17]](#footnote-17).

* **Challenges in Detection and Reporting**

Effective detection and reporting systems are critical to combating online child sexual exploitation. However, there are significant gaps in these areas due to a lack of adequate tools and mechanisms to identify and report abuse. Many existing systems rely heavily on user reports, which can lead to significant underreporting. Additionally, the use of encryption and technologies that ensure user anonymity, while important for privacy, can also hinder detection efforts.

* **Victim Identification**

Identifying victims from digital evidence remains a significant challenge. Technologies and tools to identify victims accurately and quickly are still in development, and the sheer volume of material complicates these efforts. There's also a need for better international sharing of information to prevent re-victimization and ensure that once materials are identified, they can be removed and not distributed further.

* **Privacy Concerns vs. Safety Measures**

Balancing the privacy of internet users with the need to monitor for abusive content is a contentious issue. Privacy advocates argue that increased surveillance and monitoring could infringe on individual rights, while child protection agencies emphasize the need for such measures to protect children. Finding a balance that respects privacy while ensuring the safety of children online is a complex challenge that requires nuanced solutions.

* **Support and Recovery for Victims**

Once victims are identified, there is often a lack of support and recovery services available to them. Psychological and legal support can be fragmented or inaccessible, particularly in less developed regions. Comprehensive support systems that address both the immediate and long-term needs of victims are crucial for their recovery and reintegration into society.

* **Educational and Preventive Measures**

Finally, there is often an insufficient focus on education and prevention. Many children, parents, and educators are not fully aware of the risks associated with online activities or the strategies for mitigating these risks. Enhancing digital literacy and awareness can play a critical role in preventing online child sexual exploitation. Moreover, there is a lack of awareness of the magnitude and urgency of child sexual exploitation and abuse, including online dimensions, which remains generally limited even among law enforcement practitioners. In countries where “the chief responsibility lies with cybercrime units, other crimes, such as money laundering and fraud, risk crowding out online child sexual exploitation and abuse”[[18]](#footnote-18) reducing the capacity to respond to the challenges of this problematic effectively.

Addressing these gaps requires a concerted effort from governments, international organizations, tech companies, and civil society to adapt, improve, and enforce legal and regulatory frameworks continually. Only through collaborative and coordinated efforts can the fight against online child sexual exploitation and abuse be truly effective.

1. **Are there any examples of consultation with children and youth-led organisations, for informing policy and legislation, setting technical standards and implementing processes to eradicate child sexual abuse and exploitation in the digital environment?**
2. **Girls Out Loud (Project implemented in multiple countries)**

Plan International’s project ‘Girls Out Loud’ (GOL), implemented across multiple countries including Colombia, Guatemala, Dominican Republic, Senegal and the United Kingdom aims to provide a safe and private online space for girls between 18-24 years old, to foster discussions around issues related to gender, self-image, gender-based violence and early pregnancies. The project proposes to bring girls together in an online platform led by a moderator in a positive and open approach and was started in response to the increased use of online spaces and recognition that the COVID-19 pandemic has created a gap of safe community spaces for girls and young women.

Girls Out Loud allows Plan International to identify and learn about the most important issues for girls within specific communities and to use this information to inform our work. Primarily, however, it's a channel where girls can be informed about their rights, be supported to stay safe online, and encouraged to undertake local advocacy.

“GOL it's a place where we express our feelings and opinions, a place where we are not afraid of being judged. A place where we get support when we have problems.” 17-year-old girl from Colombia.

1. **“The Future Online” – Young Activist research[[19]](#footnote-19)**

A group of young activists from Vietnam, Indonesia and Australia, with the support of Plan International, designed and lead a project to uncover how active intervention by bystanders and reform on social media platforms can fight the growing levels of abuse, gender-based violence and harassment that young people experience online.

Using a youth-centric model, that gets to the heart of what youth want from their online spaces, and considers the roles of both bystanders, and social media platforms, the young activist designed the project guide questions, conducted focus group discussions with peers and are now campaigning for change.

The project also aimed to include the voices excluded from existing research by providing a gendered lens, as well as considerations into the needs of specific groups such as LGBTQIA+ youth, Indigenous Australians, ethically and culturally diverse people, and people living with disabilities.

The key findings of this project are divided into three core categories - causes of harassment, bystander mobilisation and supporting bystanders. The youth activists concluded that to create safe online spaces, there needs to be a combined effort to improve active online bystander engagement, alongside action and accountability from social media companies - as one without the other will not resolve the growing problematic of online abuse.

The youth activists proposed a series of recommendations that emerged out of the data analysis and that focus on: bystander education & support, creating safer spaces and legal protections. They are now campaigning for the implementation of these recommendations to decision makers in Australia, Indonesia and Vietnam, including Ministries of Education and social media companies.

1. **Cyber-Safe Spaces Project for Children and Youth**

Plan International’s “Cyber-Safe Spaces Project for Children and Youth” was implemented in the cities of Manila and Quezon in the Philippines between June 2017 and August 2020. It helped protect children from online sexual exploitation and abuse (OSAEC) and ensured that children could better enjoy the benefits of the internet free from danger (both at home and in public spaces).

The project worked to combat OSAEC by empowering children and young people, educating parents, engaging national and local social service providers and duty bearers, and enabling the local Information and communication technology (ICT) industry (including internet service providers, internet café and “pisonet” shops) to proactively prevent OSAEC.

At the national level, the project collaborated with national government agencies such as the Inter-Agency Council Against Trafficking in Persons, Inter-Agency Council Against Child Pornography, and Department of Information and Communication Technology to advocate and influence policy reforms. At the community level, the project worked with key duty bearers such as village officials, members of the Barangay Protection for the Welfare of Children, faith-based leaders and members of the community.

At the local level, the project worked with the local chief executives and heads of government agencies as well as Local Committees for the Welfare of Children of Manila and Quezon Cities to get their buy in and support for project implementation. Specifically, the project targeted the multi –disciplinary teams (MDT) composed of social workers, law enforcement officers, and medical officers in each locale to ensure survivors have access to specialized, gender responsive and survivors-focused investigation, medical, psychological, healing and recovery support services. The project also collaborated with NGO partners to provide specialized survivor support services and shelter for those at risk.

1. **Free to be online**[[20]](#footnote-20)

Plan International’s *Free to be Online* research, which explored the experiences of girls and young women online, found that of the 14,000 girls and adolescents interviewed, more than half had been harassed, mostly sexual in nature, and abused on social media.

1. **What best practices can be applied to protect children and young people from sexual abuse and exploitation in the digital environment?**

Below are best practices learned from Plan International’s projects on preventing and responding to online sexual exploitation and abuse, including the SAFE Online Project[[21]](#footnote-21) in the Philippines:

* **Education and Awareness**: Educating children and young people about digital citizenship, including the risks of sexual abuse and exploitation, teaching them how to recognise inappropriate behaviour and encouraging open communication and reporting. This should be age-appropriate and gender-sensitive. Additionally, this includes positive online engagement that promotes respect, kindness and empathy.
* **Maximize Parental Controls and Monitoring**: Parents and caregivers should utilise parental control software and settings, especially for younger children. Regularly review privacy and security settings of social media platforms subscribed by children to ensure they are set to the highest level of protection.
* **Update Child Protection Policy and Guidelines**: Schools should update child protection policy to include guidelines for online behaviour and interactions. Appropriate training for educators should also be undertaken to help them recognize signs of abuse and how to respond appropriately.
* **Collaboration and Partnerships**: Fosters collaboration between governments, law enforcement agencies, civil society organizations and private sector to address online sexual abuse and exploitation.
* **Legal Protection and Enforcement**: Advocate for strong legal protections for children against online sexual abuse and exploitation. Ensure that laws, and ordinances are effectively enforced and perpetrators are held accountable for their actions.
* **International Cooperation**: Collaborative efforts between countries can facilitate information sharing, law enforcement actions and the extradition of offenders.
* **Child Participation**: Creating spaces for children to voice their concerns and priorities ensures that advocacy efforts are informed by their lived experiences.

1. **Is there any research, study or case study that helps to illustrate the scope of the problem and its possible solutions?**

* **Collaborative Action Against Trafficking (CAAT) Project. (2021). Protecting our Children: A Compilation of Emerging Practices and Initiatives in Combating Trafficking in Persons (TIP) and Online Sexual Exploitation of Children (OSEC). Plan International Philippines and Balay Mindanaw Foundation, Inc**[[22]](#footnote-22)**:**

The document is an output of the Collaborative Action Against Trafficking (CAAT) Project implemented by Plan International Philippines in partnership with Balay Mindanaw Foundation, Inc. The CAAT project was implemented in 27 communities in Eastern Visayas, CARAGA and Region X from 2017 to 2021 to contribute in strengthening child protection systems in Visayas and Mindanao, by improving prevention and response mechanisms and addressing the root causes in addressing Trafficking in Persons (TIP) and online sexual exploitation of children (OSEC).

* **Plan International: Children and the Sex Trade in the A Study on the Commercial Sexual Exploitation of Children (CSEC) in Metro Manila**[[23]](#footnote-23)**:**

Plan International commissioned the study to Psychosocial Support and Children’s Rights Resource Center, with the aim of investigating the sex industry in Metro Manila. Plan International recognize, that it only skims the surface of the entire CSEC situation in the Philippines. Through the conduct of document reviews, key informant interviews, focus group discussions with various individuals involved in the sex industry, and validation of the findings with experts and a range of stakeholders, the research sheds some light on the dark and often overlooked world of CSEC.

* **Plan International: SaferKidsPH: Action Research on Changing Social Norms for Online Sexual Abuse and Exploitation of Children (OSAEC) through Social and Behavior Change (SBC) Programming FINAL REPORT**[[24]](#footnote-24)**:**

This research sought to achieve the following: (1) to validate the 2018 study assessment of geographic, demographic, economic, technological, and political factors that contribute to the vulnerability of individuals and communities to online sexual abuse and exploitation; (2) to understand the drivers of violence in the communities, which impacts the rights of children to be protected from all forms of violence (including peer group influence, family relationships, parental love and care, and social networks); (3) to understand the intersectionality of factors that contribute to violence against children at home, community, and online, including gender equality, disability, and social inclusion; (4) to assess community beliefs, attitudes, values, and other forms of social norms, including gender, and cultural practices that promote or hinder child protection particularly the online sexual abuse and exploitation of children; and (5) to assess children’s views regarding child rights and child protection, sexual and reproductive health and rights (SRHR), moral values, preferences and behavior and child abuse including online pornography.

* **UNICEF: Ending Online Child Sexual Exploitation and Abuse. *Lessons Learned and promising practices in low and middle-income countries****[[25]](#footnote-25):*

This report takes stock of UNICEF’s work to address online child sexual exploitation and abuse. It is intended for policymakers and practitioners to inform policy and practice in this field. Based primarily on analysis of survey responses from 29 UNICEF country offices, the report sets out the current level of implementation of the WeProtect Model National Response, gaps and challenges in low- and middle-income countries, and promising practices and lessons learned.

* **WeProtect Global Threat Assessment 2023: Assessing the scale and scope of child sexual abuse online**[[26]](#footnote-26)

WeProtect Global Alliance produces a Global Threat Assessment report every two years to assess and track the changing scale and nature of Child Sexual Exploitation and Abuse Online, in order to inform and direct the global response.

* **Disrupting Harm in the Philippines: Evidence on online child sexual exploitation and abuse. Global Partnership to End Violence Against Children ECPAT, INTERPOL, and UNICEF  Philippines  2022**[[27]](#footnote-27)

Funded by the Global Partnership to End Violence against Children through its Safe Online initiative, ECPAT, INTERPOL and UNICEF Office of Research – Innocenti worked in partnership to design and implement Disrupting Harm – a research project on online child sexual exploitation and abuse (OCSEA). This partnership brings a multidisciplinary approach to a complex issue to examine multiple facets of the problem. The research was conducted in seven Eastern and Southern African countries and six Southeast Asian countries including the Philippines. Data is synthesised from nine different research activities to generate each national report which tells the story of the threat and presents clear recommendations for action.

1. **Recommendations**

To effectively combat online sexual exploitation and abuse (SEA) and gender-based violence (GBV), both national governments and technology and social media companies must implement comprehensive and targeted strategies:

**Tech and Social Media Companies Must:**

* **Strengthen Reporting Mechanisms:** Create stronger, more effective, and accessible reporting mechanisms specific to online GBV and SEA. These mechanisms must hold perpetrators accountable and be responsive to the needs and experiences of all girls, considering intersecting identities such as race, ethnicity, and disability.
* **Enhance Review Processes:** Increase the effectiveness and timeliness of report review, investigation, and response processes to ensure quick and appropriate actions are taken against reported abuses.
* **Publish Data:** Collect and publish disaggregated data (by country, language, etc.) on abuse reports, reviews, investigations, and responses. This transparency allows for tracking by researchers, civil society, and user groups, promoting accountability.
* **Improve Complaint Handling:** Enhance appeal and internal complaint mechanisms in compliance with the effectiveness criteria outlined in the UN Guiding Principles on Business and Human Rights. [[28]](#footnote-28).
* **Train Moderators:** Improve the knowledge and cultural competence of human moderators in online GBV and CSEA, ensuring they understand the language, culture, and socio-political context of the content they are moderating.
* **Collaborate with Users:** Work with girls and young women globally to co-create policy and technical solutions that address and prevent online sexual exploitation and abuse.
* **Language and Regional Accessibility:** Ensure that privacy and security features, reports, notices, and review and appeals processes are available in the languages users interact with on their platforms. Ensure no disadvantage on the basis of language, country, or region.
* **Conduct Due Diligence:** Perform human rights due diligence[[29]](#footnote-29) for content curation and moderation activities; identify, assess, and mitigate risks that may affect girls’ rights including their safety and wellbeing.
* **Enhance Privacy and Security Features:** Make it easier for girls and young women to avoid GBV and abuse on platforms through improved privacy and security features.
* **Launch Educational Campaigns:** Initiate youth-friendly and gender-transformative campaigns, tools, and games that educate users about respectful behavior, privacy, security features, reporting mechanisms, and other protective measures.

**National Governments Must:**

* **Reform Legislative Frameworks:** Update and reform legislative frameworks to address online harassment and violence against all girls and young women, taking into account intersectional characteristics and the specific nature of online violence.
* **Implement and Monitor Legislation:** Enact and monitor legislation that prevents and responds to violence against children and gender-based violence, with a particular focus on online environments.
* **Enhance Implementation Capacity:** Enable effective implementation of laws and policies by relevant government departments (e.g., police, judiciary, prosecution services, and regulatory authorities) addressing online SEA and GBV.
* **Train First Responders:** Improve the knowledge, capacity, and skills of first responders and relevant officials to address online GBV and SEA in a gender-responsive and rights-respecting manner through specialized training and guidelines.
* **Adopt Transparency and Accountability Measures:** Enforce human rights-based transparency, accountability, and reporting requirements for platforms, along with due process safeguards for users concerning online GBV and SEA.
* **Educate and Empower:** Create education programs and campaigns to educate children and young women about their rights, online privacy, and security, enabling them to identify risks and protect themselves from online abuse and violence.
* **Involve Meaningfully Children in Policy Making:** Create spaces for children, particularly girls, to be heard in policy discussions and decision-making processes regarding online abuse and exploitation, ensuring their views are meaningfully considered in all steps of the process.
* **Ensure Access to Effective Remedy:** Guarantee that those affected by online GBV or SEA have access to effective remedies and that the presence of internal complaint handling mechanisms of tech companies does not preclude access to courts or other state-based redress mechanisms.

These comprehensive steps by both tech companies and national governments will foster a safer online environment, directly addressing the complexities of online sexual exploitation and abuse and gender-based violence.

**END**

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25. [Ending Online Child Sexual Exploitation and Abuse | UNICEF](https://www.unicef.org/documents/ending-online-child-sexual-exploitation-and-abuse) [↑](#footnote-ref-25)
26. <https://www.weprotect.org/global-threat-assessment-23/> [↑](#footnote-ref-26)
27. [DH\_Philippines\_ONLINE\_FINAL.pdf (end-violence.org)](https://www.end-violence.org/sites/default/files/2022-04/DH_Philippines_ONLINE_FINAL.pdf) [↑](#footnote-ref-27)
28. Guiding Principle 31 state that operational-level grievance mechanisms should be legitimate, accessible, predictable, equitable, transparent, rights-compatible, based on dialogue and engagement, and a source of continuous learning.

    <https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf> [↑](#footnote-ref-28)
29. According to the United Nations Guiding Principles on Business and Human Rights, enterprises should exercise human rights due diligence to proactively manage potential and actual adverse human rights impacts with which they are involved. HRDD involves four core components: (a) Identifying and assessing actual or potential adverse human rights impacts that the enterprise may cause or contribute to through its own activities; (b) Integrating findings from impact assessments across relevant company processes and taking appropriate action; (c) Tracking the effectiveness of measures and processes to address adverse human rights impacts in order to know if they are working; and (d) Communicating on how impacts are being addressed and showing stakeholders – in particular affected stakeholders – that there are adequate policies and processes in place.

    <https://www.ohchr.org/sites/default/files/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf> [↑](#footnote-ref-29)