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Commercial Sexual Exploitation of Children: What Do We Know and What Do We Do About It?

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REPORT



Commercial Sexual Exploitation of Children: What Do We Know and What Do We Do About It?

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Commercial Sexual Exploitation of Children: What Do We Know and What Do We Do About It?

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ABOUT THIS REPORT

Much investigation remains to be done regarding the commercial sexual exploitation of children (CSEC). As with other “low visibility” crimes, there is a lurking “dark figure” of unreported cases. Moreover, little reliable information exists about the types of people who exploit children in this way.

Research has revealed that CSEC takes place at three levels: local exploitation by one or a few individuals, small regional networks involving multiple adults and children, and large national or international sex crime networks where children are traded and sold as commodities.

What prevention and intervention programs exist?

Current U.S. outreach programs include the National Center for Missing & Exploited Children (NCMEC) Cyber-Tipline and 40 regional task forces funded by the Office of Juvenile Justice and Delinquency Prevention. There is also a Federal law that requires Internet service providers to report child pornography on their systems

to NCMEC. Federal programs include the FBI’s Innocent Images National Initiative, which targets crimes conducted via the Internet, and a U.S. Postal Service program focusing on child obscenity sent through the mail. On an international level, the United States participates in World Congresses on CSEC and supports United Nations programs that attack CSEC on the global stage.

What more can be done?

- Keep pace with new technologies, such as those that create “virtual” images of children in pornographic situations.
- Educate potential victims about the tactics used by recruiters.
- Educate the public about the great harm caused by CSEC.
- Improve parental supervision of vulnerable children.
- Enhance the role of women and children in societies where they are treated as sex objects.

Jay Albanese

Commercial Sexual Exploitation of Children: What Do We Know and What Do We Do About It?



The commercial sexual exploitation of children (CSEC) is sexual abuse of a minor for economic gain. It involves physical abuse, pornography, prostitution, and the smuggling of children for unlawful purposes. Although there have been efforts in recent years to better define CSEC, more needs to be done to publicize its existence and develop strategies to reduce its incidence.

The number of known cases of CSEC is growing. Children are being kidnapped and sold into forced labor in the illegal sex industry. Some impoverished families are selling their children to traffickers in the hope of giving the children a better life. There are documented reports of children being held captive in basements and other slavelike conditions where they are beaten, malnourished, threatened, and sexually exploited.

In the United States, it is more common for children to

be sexually exploited for monetary gain by family and friends. Often, the cycle of exploitation begins when an adult family member or friend sexually abuses a minor child in his or her care. This can escalate to systematic sexual behavior involving multiple children, and to photographing or videotaping sexual abuse and distributing it through the Internet.

The criminal justice system has a significant role to play in addressing commercial child sexual exploitation, especially in its more organized forms: serial victimization of multiple children; networks of adult exploiters; and the kidnapping, smuggling, and sale of children as commodities. As technology and communication become more advanced and global travel becomes easier, the effort to prevent CSEC must become more sophisticated.

About the Author

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How extensive is the problem?

To date, no concerted effort has been made to gather reliable data regarding the extent of the commercial sexual exploitation of children. As with other so-called “low visibility” crimes, the greatest challenge in assessing the prevalence of CSEC is the size of the “dark figure,” i.e., for every report of CSEC, how many cases go unreported?

In 1996, the U.S. Congress established the Exploited Child Unit within the National Center for Missing & Exploited Children (NCMEC). Two years later, NCMEC launched a toll-free telephone line, CyberTipline (1-800-843-5678), and a Web site (www.cybertipline.com) to increase

the public’s ability to report cases of child sexual exploitation. From 1998 to 2004, there were almost 300,000 hotline tips regarding child sexual exploitation (see exhibit 1).

Increases in CyberTipline calls may be due to a number of reasons:

- Growing awareness of dedicated ways to report child sexual exploitation.
- Rapid growth worldwide in the use of the Internet.
- A Federal law requiring Internet service providers to report child pornography on their systems to NCMEC.
- An increase in the prevalence of the sexual exploitation of children.

NCMEC estimates that 1 in 5 girls and 1 in 10 boys are sexually abused or assaulted before they reach adulthood; less than 35 percent of those cases are reported to authorities. Unfortunately, the data on which these estimates are based are incomplete.

Interviews with police officers, victim service providers, and, if possible, victims and offenders may help develop a better understanding of the

Exhibit 1. Calls to NCMEC CyberTipline

Year	Tips	Increase
1998	4,578	—
1999	9,673	111%
2000	19,276	99%
2001	24,460	27%
2002	43,097	76%
2003	81,987	90%
2004	112,017	37%

Source: National Center for Missing & Exploited Children

problem. More accurate data on the commercial sexual exploitation of children is necessary before the success of prevention and intervention measures can be evaluated.

Continuum of abuse, recruitment, and exploitation

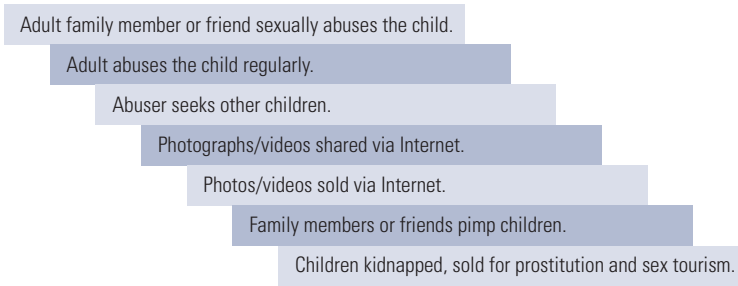
The case histories of child sexual exploitation victims often reveal a continuum of abuse, frequently starting with abuse by a family member (see exhibit 2).

A study on recruitment, based on a survey of child and youth service providers and interviews with officials at governmental and non-governmental organizations, estimated that pimps control about 50 percent of the girls engaged in prostitution in the

United States.¹ Pimps scout bus stations, arcades, and malls, focusing on girls who appear to be runaways without money or job skills. Pimps, or their procurers, befriend the children by showing affection and buying them meals, clothes, jewelry, or video games in exchange for sex.

Eventually, pimps use the children’s emotional and financial dependency to coerce them into selling sex for money that is turned over to the pimp. In time, the relationship becomes less emotional and more “contractual” as the pimp sets a minimum on the child’s earnings. In one case, for example, a pimp recruited girls from Vancouver, British Columbia, and took them to Hawaii, withholding their papers so they could not leave. The girls were drugged,

Exhibit 2. Continuum of abuse and commercial exploitation*



*Based on numerous case histories.

handcuffed, and told that if they did not comply, photographs of them engaging in sex would be sent to magazines or to their families.²

Traffickers also recruit children by convincing families—through “success” stories—that their children will be safer, better taken care of, and taught a useful skill or trade. Cash may be paid to families, to be “repaid” through their child’s earnings. (Sometimes a “contract” is created that implies a legal indebtedness, which provides even more leverage to force a child into prostitution.)

One Mexican study revealed that, upon arriving in Tijuana, 14- to 17-year-old girls were recruited by “middlemen” (local exploiters), beaten, and threatened that their families would be harmed. Other means of maintaining control over the prostituted children included giving them drugs and keeping them in forced isolation. In addition to their sexual exploitation in brothels and on the streets, the girls in this study were forced to work in hotels, boarding houses, parks, bus stations, bars, nightclubs, beauty and massage parlors, modeling and escort agencies, and spas. Adults seeking sex with

children obtained referrals from waiters, doormen, taxi drivers, receptionists, nightclub security guards, valet parking attendants, and street vendors.³

How is CSEC organized?

Little reliable information is available regarding the types of people and networks involved in CSEC. Existing data come from a small number of research studies and reports of nongovernmental organizations, none of which provide a complete picture of CSEC.

Research based on interviews with pimps and sexually exploited children in several U.S. cities found that most pimps manage one to three girls at a time and operate along the following lines:⁴

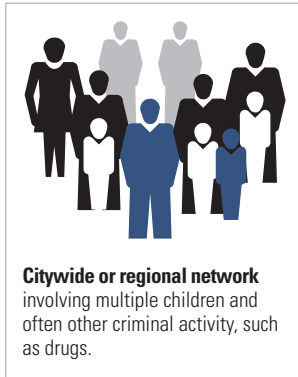
- At least half appear to operate at the local level only and are not part of a larger criminal network.
- At least one-quarter may be tied to citywide crime rings (often engaged in drug sales as well as prostitution) and are constantly looking for new recruits.

■ About 15 percent are tied to regional or national networks that are well financed and organized, in which the pimps communicate easily with one another electronically (e.g., via cell phone); provide support services such as recruitment, selection, indoctrination, and movement of new girls; and occasionally assist in locating and disciplining girls who escape from other pimps.

■ About 10 percent appear to be tied to international sex crime networks and, through them, actively participate in the international trafficking of children. Some pimps also are part of international drug networks and may use children to move drugs into and across the United States.

Exhibit 3, “Organization of commercial sexual exploitation of children,” illustrates the organizational structures of CSEC.

Exhibit 3. Organization of commercial sexual exploitation of children



Common Features

- Minors are exploited for monetary gain and the sexual gratification of the exploiters and their clients.
- New “recruits” are constantly sought.
- False promises of a “better life” are a central recruitment tool.
- Once exploited, children are often threatened or assaulted to ensure obedience and prevent escape.

Roles in organized trafficking

The following roles exist in organized trafficking:

- Investors or “arrangers” who provide money for trafficking operations and oversee the criminal enterprise.
- Recruiters who find the children and may collect fees from their families.
- Transporters who move the children through the origin, transit, and destination countries.
- Public officials who receive bribes to provide identity documents and facilitate exiting and entering countries.
- Informers who gather information on border surveillance, law enforcement activities, and immigration and transit procedures.
- Debt collectors in destination countries who collect trafficking fees, which can be \$30,000 or more per person.
- Money movers who launder trafficking proceeds.

Researchers estimate that 10–15 percent of children living on the streets in the United States are trafficked for sexual purposes.⁵ This figure includes U.S. residents trafficked inside and outside the country and children from other countries.

Some foreign children trafficked into the United States work in sweatshops under coercive and sometimes slavelike conditions. Others become victims of commercial sexual exploitation. Traffickers are skilled in providing fake documents with false names and ages. Sometimes an easily acquired tourist visa suffices. Often traffickers tell children that if they escape or cooperate with law enforcement, previous cash advances to their families and other money “owed” will be collected from their parents, who may also be physically harmed.⁶

“Sex tourism”—including Americans who travel to destinations in or outside of the United States to have sex with children—is also a significant problem in some locations. According to one study of the situation in Tijuana, Mexico, “Sex tourism is something that happens daily as Americans cross the border

with the purpose of having a sexual exchange with minors.”⁷ Sex tourists usually frequent relatively poor countries that have well-developed commercial sex industries, although the travel pattern is also reversed, with sex tourists coming from poorer countries (for example, Argentina, India, and Mexico) to such affluent sex-tourist destinations as Amsterdam, Las Vegas, and New York.⁸

Pornography

Children also may be commercially sexually exploited for purposes of pornography. The producers of child pornography include members of organized crime, pedophiles, sex tourists, and family members.

Organized crime. Organized crime pornographers have been reported to involve children under 9 years of age, sometimes portraying them in photos and videos as adults. Well-organized networks of pornographers in Mexico, for example, have bought girls and boys in poor regions and rotated them from place to place, keeping them under the influence of drugs. In another case, procurers told parents their children (girls and boys aged 6 to

12) would be given an education and a job; parents received monthly payments but did not know that their children were the subject of pornography.⁹

Child sex rings. Child pornography produced by sex rings is used in members’ personal collections and is often offered for publication, sale, or exchange via the Internet or e-mail.¹⁰

Pedophiles. Child pornography may play a key role in molestation by pedophiles, helping them justify their conduct and assisting them in seducing victims and blackmailing children to avoid exposure. Some pedophiles have sold homemade videos and photographs of child pornography, using the profits to help finance trips to sex tourism destinations.¹¹

Parents and other family members. Children may be photographed by parents as part of intrafamilial child sexual abuse. A U.S.-focused study noted that although child prostitution primarily involves runaways, about 75 percent of child pornography victims are living at home when they are exploited.¹² This suggests that a significant portion of commercial

child sexual exploitation begins in home settings.

Reducing commercial sexual exploitation of children

As with all borderless crimes, reducing the commercial sexual exploitation of children requires a multipronged approach aimed at increasing public awareness, promoting the public's ability to report incidents, and strengthening national and international interdiction and prosecution.

In Virginia, for example, an Internet service provider called the National Center for Missing & Exploited Children's CyberTipline to report that a subscriber had posted pornographic photos involving children to an online group. Analysts used Internet search engines to find the suspect's name, address, and

Social Security number. The local sheriff, working with the FBI, secured warrants and arrested the suspect, who pled guilty to distributing child pornography.¹³

Training community groups and law enforcement officials also would help reduce the incidence of CSEC. The Office of Juvenile Justice and Delinquency Prevention, an agency within the U.S. Department of Justice, funds 40 regional task forces that provide expertise in CSEC investigations.

Public awareness of CSEC has also been greatly increased in recent years through legislation. Most countries have laws—with substantial penalties—that prohibit the sexual exploitation of children, including kidnapping, smuggling, and, more recently, trafficking in human beings. Despite this

TEENAGE PROSTITUTES: VICTIMS, NOT OFFENDERS

When child-victims of commercial sexual exploitation come to the attention of authorities, the public often regards them as teenage prostitutes, but this is not an accurate description. Rather, when a minor, with few visible choices, sells sex at the hands of an exploitative adult, it is generally a means of survival. The term 'teenage prostitution' also overlooks the legal status of minors who have greater legal protections regarding sexual conduct because of their emotional and physical immaturity and the need to protect them from exploitative adults. Therefore, it is important that victims of child sexual exploitation are not mistaken for offenders.

progress, however, the globalization of crime, dramatically increased access to the Internet, and ease of travel have brought new challenges to the prevention of CSEC.

Global agreements. One way to meet these challenges is through international agreements and treaties. The first World Congress Against Commercial Sexual Exploitation of Children—held in Stockholm in 1996—was attended by 122 nations and brought CSEC to light as a worldwide problem. Five years later, the second World Congress attracted three times as many participants.

Another tool that promotes international cooperation is the United Nations Convention Against Transnational Organized Crime, which has an anti-human-trafficking “protocol” focused on women and children. As of the summer of 2007, 134 countries had ratified the protocol and another 13 had signed but not yet ratified it. Law enforcement agencies in countries that ratify the protocol are required to cooperate in the identification of offenders and trafficked persons, share information about trafficking methods, and train

investigators and victim support personnel.

Signatory countries are also required to implement security and border controls and develop standards for passports, visas, and other travel documents. The protocol also calls for measures to prevent revictimization—that is, when victims are returned to their countries of origin only to be trafficked out again. Although the U.N. protocol represents an enormous step forward, some have argued for a separate international agreement to explicitly address the abduction of children for purposes of sex trafficking, pornography, or prostitution.

U.S. initiatives. The FBI’s Innocent Images National Initiative is one example of a multiagency effort to combat child pornography and child sexual exploitation via the Internet. A component of the FBI’s Cyber Crimes Program, the Innocent Images initiative provides coordination and analysis of case information among agencies and governments in an effort to establish a law enforcement presence and deterrence on the Internet. From 1996 to 2006, the number of Innocent Images cases rose from 113 to 2,135.¹⁴ The U.S. Postal

Service has a program focusing on child pornography sent through the mail.¹⁵ Federal cases of CSEC are prosecuted by the Child Exploitation and Obscenity Section of the U.S. Department of Justice, which is also involved in training and policy development in the areas of child pornography, trafficking, and related crimes.¹⁶

What can we do?

In addition to supporting existing intervention and prevention measures, these actions could have a dramatic impact on reducing the commercial sexual exploitation of children:

- Keep pace with technology.
- Educate potential victims.
- Educate the public.
- Improve parental supervision.
- Enhance the role of women and children in society.

Keep pace with technology. The U.S. Department of Homeland Security, in partnership with the National Center for Missing & Exploited Children, manages Operation Predator, a law

enforcement initiative to protect children from pornographers, child prostitution rings, Internet predators, and human traffickers. Launched in 2003 and coordinated through the Department's Bureau of Immigration and Customs Enforcement (ICE), Operation Predator uses the Internet to identify child predators.

ICE also works with the FBI, the U.S. Postal Inspection Service, the U.S. Secret Service, and the Justice Department on the National Child Victim Identification Program, the Nation's first comprehensive effort to help police around the world identify and rescue children who are being sexually exploited. The National Child Victim Identification Program has identified children in hundreds of pornographic images. In one case, for example, the New York State Police intercepted child pornography images and sent them to ICE agents who were able to match the images to children. The defendant in that case was convicted, despite his defense that the images were not photographs of actual children but, rather, were "virtual" or "morphed."¹⁷ This issue—virtual versus "real" images—demonstrates how important it is for the criminal

justice system to keep pace with evolving technologies.

Educate potential victims.

Children from poor communities in the U.S., Latin America, and Asia are especially vulnerable to sexual exploitation for commercial purposes.¹⁸ Innovative, creative approaches must be used to help educate these populations about the problem.

For example, the International Organization for Migration, a nongovernmental organization, produced *Shattered Dreams*, an animated film that tells the story of two sisters who travel to the “big city” (Bangkok) for a better life, but end up in forced prostitution. When the film was shown to children in Thailand who had been rescued from forced labor in factories, 90 percent of them said that they would not have gone to Bangkok if they had known about the risk of forced prostitution depicted in the film.¹⁹

The United Nations Office of Drugs and Crime has produced public service television announcements in six languages aimed at raising awareness of trafficking in women and children.

Educate the public. The commercial sexual exploitation of children is a demand-driven crime. Although it is important to deter consumers through investigation and prosecution, it is also crucial to raise the perceptions of consumers about the harm that is caused. Highly publicized shutdowns of sex tour operators—through sting operations or undercover agents posing online as children, for example—also may improve deterrence.

Improve parental supervision. Many children who become victims of commercial sexual exploitation have suffered from absent, negligent, or abusive parenting. A survey of adult prostitutes at an Atlanta jail, for example, revealed that nearly half had been sexually molested as children.²⁰ Carefully planned and evaluated child abuse prevention programs, better treatment of victims, and more attention focused on abusive households would help address the issues that can underlie CSEC.

Enhance the role of women and children in society. In some places, women and children are considered unworthy of respect and stereotyped as sex objects.

Poverty, globalization, porous borders, aggressive sex tourism campaigns, Internet pornography, mail-order brides, intercountry adoption, and visiting foreign military forces: all of these factors can affect attitudes toward women and children.²¹ Researchers in the U.S. have pointed out that some popular culture and music glorifies pimping and treating young women like property.²² Changing these perceptions may help decrease CSEC.

Directions for the future

Additional research that investigates intervention and prevention measures—including an assessment of the risk factors for children—would be an important step toward reducing the commercial sexual exploitation of children. In particular, more research is needed to assess the impact of deterrence and education approaches.

For more information

Visit NIJ's Web site at www.ojp.usdoj.gov/nij and enter "CSEC" or "Commercial Sexual Exploitation of Children" in the search box.

Notes

1. Estes, Richard J., and Neil Alan Weiner, "The Commercial Sexual Exploitation of Children in the U.S., Canada, and Mexico," revised final report for National Institute of Justice, grant number 1999-IJ-CX-0030. Philadelphia: University of Pennsylvania, School of Social Work, Center for the Study of Youth Policy, 2002: 110–111. Available online at www.sp2.upenn.edu/~restes/CSEC.htm. Accessed November 1, 2007.
2. Ibid.
3. Klain, Eva J., *Prostitution of Children and Child-Sex Tourism: An Analysis of Domestic and International Responses*, Washington, DC: National Center for Missing & Exploited Children, 1999.
4. Estes and Weiner, "The Commercial Sexual Exploitation of Children in the U.S., Canada, and Mexico" (see note 1).
5. Ibid.
6. U.S. Department of State, *Trafficking in Persons Report*, Washington, DC: U.S. Department of State, June 2003; Barnitz, Laura A., *Commercial Sexual Exploitation of Children: Youth Involved in Prostitution, Pornography, and Sex Trafficking*, Washington, DC: Youth Advocate Program International, 1998; The Protection Project, *Trafficking in Persons, Especially Women and Children in the Countries of the Americas*, Washington, DC: Johns Hopkins University School of Advanced International Studies, 2000.
7. Klain, *Prostitution of Children and Child-Sex Tourism: An Analysis of Domestic and International Responses* (see note 3).
8. Ibid.
9. Healy, Margaret A., "Child Pornography: An International Perspective," a working document for the 1996 World Congress Against Commercial Sexual Exploitation of Children, Stockholm, Sweden, August 27–31, 1996; Azaola, Elena, *Stolen Childhood: Girl and Boy Victims of Sexual Exploitation in Mexico*, Mexico City: Comunicación Gráfica y Representaciones, 2001.
10. Klain, Eva J., Heather J. Davies, and Molly A. Hicks, *Child Pornography: The Criminal Justice System Response*, Washington, DC: National Center for Missing & Exploited Children, 2001.
11. Healy, "Child Pornography: An International Perspective" (see note 9).
12. Estes, "The Commercial Sexual Exploitation of Children in the U.S., Canada, and Mexico" (see note 1).
13. National Center for Missing & Exploited Children, "Winchester Man Pleads Guilty to Child Pornography Charges," US Fed News (October 19, 2005).
14. Federal Bureau of Investigation, Innocent Images National Initiative. www.fbi.gov/publications/innocent.htm. Accessed November 1, 2007.

15. U.S. Postal Inspection Service, Mailing of Child Pornography. www.usps.com/postalinspectors/kid-porn.htm. Accessed November 1, 2007.
16. U.S. Department of Justice, Child Exploitation and Obscenity Section. www.usdoj.gov/criminal/ceos. Accessed November 1, 2007
17. Seper, Jerry, "Initiative Targets Child Exploitation," *Washington Times* (July 10, 2003).
18. EchoHawk, Larry, "Child Sexual Abuse in Indian Country: Is the Guardian Keeping in Mind the Seventh Generation?," *New York University Journal of Legislation & Public Policy* 5 (2001/2002): 83–128; Mora, José Eduardo, "Rights—Central America: Poverty Spurs Growth of Child Sex Rings," Inter Press Service (October 14, 2003).
19. "'Shattered Dreams' to Educate Migrants," *The Nation* (Thailand) (November 12, 2003).
20. Hansen, Jane O., "Child Prostitution: Where is Lloydia?" *Atlanta Journal-Constitution* (November 12, 2000).
21. Vilches, Judge Nimfa Cuesta "Commentary: Trafficking of Women and Children," *Businessworld* (December 17, 2003); Media Institute of Southern Africa, "We Should All Be Ashamed by the Sexual Exploitation of Girls," *Africa News* (November 25, 2003); see also Fernando, Jude L., "Children's Rights: Beyond the Impasse," *The Annals of the American Academy of Political and Social Science* 575 (May 2001): 8–24.
22. Thompson, Carla, "Hottest Hip Hop Glorifies Pimping," Inter Press Service (November 11, 2003); Albanese, Jay S., "Looking for a New Approach to an Old Problem: The Future of Obscenity and Pornography," in *Visions for Change: Crime and Justice in the 21st Century* (4th edition), ed. R. Muraskin and A. Roberts, Upper Saddle River, NJ: Prentice Hall, 2005.

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