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Karuna Nain and Paula Garuz Naval Global Safety Policy team Facebook 1 Facebook Way Menlo Park CA 94025

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Child abuse in pro-spanking groups on Facebook

Dear Karuna and Paula,

We write as experts representing the child protection sector and the consensual kink community, to alert you to a form of child sexual abuse that Facebook's Community Guidelines do not yet prohibit. We are requesting you to take action to eliminate the loophole that allows these groups to operate openly on Facebook.

The groups in question present themselves as promoting spanking as a method for the discipline of children, and often adopt the language of Christianity to create an appearance that they are legitimate. However, a closer analysis of these groups demonstrates that they are being used by adults to engage in the fetishistic and voyeuristic enjoyment of the physical and sexual abuse of children.

One such group, "Family Pro Spank Workshop," promoted a full four-day event in which children would be stripped naked and spanked in full view of those attending as a "demonstration." In another group, "Moms4discipline," a participant shares a photograph of a real child being battered, and promises "I have some other pics of this same spanking but can't really post publicly," to which another member replies, "I would love to see." A third group, "Parents in favor of spanking," claims, "This group is not about adult content, fetishes, or inappropriate/illegal activity directed towards minors," even though one of the group administrators has an eroticized photograph of a child being spanked as his profile picture.

Although the administrator of the first group mentioned above shut it down after attention was drawn to it, Facebook has taken no action on complaints about these groups because they do not violate its Community Guidelines. We believe that a review of the Guidelines should be conducted to ensure that such groups are no longer permitted.

We recognize that in a number of jurisdictions the law allows children to be physically battered ("disciplined") by their parents, and that some mainstream Christian churches also support this practice. But in our view, it is never appropriate for children to be photographed while being physically battered and for those images to be shared with third parties. Neither is it ever appropriate to allow the promotion of public events at which children are spanked in front of others—especially not while they are unclothed. This is unquestionably a form of child sexual abuse.

There is legal precedent for the fact that some predators use "spanking" as a cover for fetishistic child sexual assault. In 2002, twelve children were removed from their parents' homes after investigators uncovered a "club" in which parents exchanged videos of themselves spanking their own kids. According to a 2002 *Chicago Tribune* article that covered the investigation, the videos showed parents "administering repeated spankings to ... naked children, who cried out in pain during the prolonged beatings." The child spanking groups that operate on Facebook today are merely the newest versions of this abusive and exploitative practice.

Although it may be that not all of those who are members of these groups sexually fetishize the spanking of children, or recognize that they are doing so, it is quite apparent that there are certainly some who are consciously doing this. We believe that there is no reliable way for Facebook to allow pro-spanking groups without providing a haven for these individuals, and that the only safe course of action is for Facebook to revise its Community Standards to prohibit groups that promote the physical punishment of children or that contain depictions of such abuse.

We would welcome the opportunity to engage with you directly to help devise the appropriate revisions to Facebook's Community Guidelines. Together, we can stamp out the misuse of your platform to facilitate the physical and sexual abuse of children.

Many thanks in appreciation of your attention to this sensitive and important issue.

Yours sincerely,

Jeremy Malcolm

Executive Director, Prostasia Foundation

Jillian Keenan

Author and spanking expert