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Jan Eissfeldt
Director, Global Head of Trust & Safety
Wikimedia Foundation
1 Montgomery Street Suite 1600
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July 28, 2023

Dear Mr. Eissfeldt,

#### Wikimedia Foundation's Child sexual exploitation policy project

I write as the Executive Director of Prostasia Foundation, a child protection organization that advocates for an evidence-based approach to the prevention of child sexual abuse. My professional background is as a sexual violence prevention professional. I am an Assistant Professor of Psychology and the Director of the Sexual Neuroendocrinology Lab (SeNeu Lab). I also serve on the Board of Directors of the New York State Association for the Treatment and Prevention of Sexual Abuse and the New York State Alliance for the Prevention of Sexual Abuse.

I am writing to provide input on the Wikimedia Foundation's Child Sexual Exploitation Policy Project. The goals of the project as described by the Foundation are to produce a set of policies that will allow the Foundation's Trust and Safety team to improve existing practices addressing issues of misconduct on the projects, including but not limited to:

- The upload and dissemination of illegal imagery, specifically regarding CSAM (Child Sexual Abuse Material), in parity with industry partners
- Advocacy or attempted normalization of pedophilia, sexualization of minors, or child abuse
- Handling situations involving child abuse-related offenses

The opportunity to provide this input is especially timely because it allows me to share a separate concern that colleagues and I have developed about the enforcement of the existing

child protection policies of Foundation projects. In particular, we have observed that community members have been enforcing the child protection policy of English Wikipedia in a manner that seems quite arbitrary and contrary to its stated goals. The appendix to this letter contains examples of this.

When editors who contribute information about pedophilia and child sexual abuse are treated with suspicion, hostility, and *ad hominem* abuse as has been the case on English Wikipedia, this creates a chilling effect that can only dissuade knowledgeable editors from contributing to the Foundation's projects. This in turn will reduce its quality and allow misinformation to flourish.

I hope that this letter will assist the Foundation in providing further guidance to its community on the enforcement of its child protection policy, to ensure that this supports rather than undermines the policy's goals.

#### Background

At the root of much of the hostility shown towards Wikipedia editors contributing information on pedophilia and child sexual abuse seems to be a misconception that these are one and the same. But in reality pedophilia and child sexual abuse represent *two different phenomena*. It is crucial to understand that professionals who address misunderstandings about pedophilia are in no way condoning, minimizing, or excusing the intolerable and illegal act of child sexual abuse.

Pedophilia is a clinical term for when someone has a primary sexual attraction towards prepubescent children. Not everyone with a pedophilic attraction offends. In fact, 40-60% of child sexual abusers do not qualify as having pedophilia, and many people who do have never offended and will never offend.<sup>1,2</sup>

The conflation of pedophilia with child sexual abuse leads to a dangerous fallacy that puts children at risk. The misconception that people who sexually abuse children are all pedophiles provides the public with a false sense of security that hinders effective preventive measures. Research shows that 40% of children who have experienced child sexual abuse have been abused by other youth, while 60% of people who commit a sexual offense are someone who the family knows and trusts.<sup>3</sup>

At the same time, pedophiles and other minor-attracted people do offend against children at a higher rate than those who don't carry this affliction – but preventing offenses is possible. Therapy and support groups are one effective secondary preventative measure for minor-attracted people that helps them to not offend.<sup>4</sup> However, the stigma that they face when disclosing their attraction leads to social isolation and internalized shame, factors that prevent

<sup>&</sup>lt;sup>1</sup>Seto, M. C. (2008). *Pedophilia and sexual offending against children: Theory, assessment, and intervention.* 2nd. Ed. American Psychological Association. DOI:<u>10.1037/0000107-000</u>

<sup>&</sup>lt;sup>2</sup> Cantor, J.M., McPhail, I.V. Non-offending Pedophiles. *Curr Sex Health Rep* 8, 121–128 (2016). https://doi.org/10.1007/s11930-016-0076-z

<sup>&</sup>lt;sup>3</sup> https://www.d2l.org/wp-content/uploads/2017/01/Statistics\_2\_Perpetrators.pdf

<sup>&</sup>lt;sup>4</sup> Knack, N., Winder, B., Murphy, L., & Fedoroff, J. P. (2019) Primary and secondary prevention of child sexual abuse, International Review of Psychiatry, 31:2, 181-194, https://doi.org/10.1080/09540261.2018.1541872

them from seeking help and increase the risk of offending.<sup>5,6</sup> So too, discriminatory attitudes discourage the number of professionals willing to work with this population.<sup>7</sup>

But the good news is that research suggests that scientifically correct media coverage of pedophilia can help overcome barriers for those seeking therapy. So while conflating child sexual abuse and pedophilia can be harmful, reporting on pedophilia based on up-to-date literature and credible experts can help destignatize help-seeking by minor-attracted people, which contributes to the prevention of offending. In this way, by providing a source of accurate information on this fraught and emotive topic, Wikipedia has the potential to act as a force for social good.

#### The upload and dissemination of CSAM

In the context of the above background discussion, it follows that the dissemination of images of child sexual abuse – formerly known as child pornography and now as CSAM – is an inexcusable crime that cannot be downplayed or excused. A large part of my work as a sexual abuse preventional professional is geared towards preventing CSAM offending and reducing the spread of abusive content.

I fully support the Foundation's efforts to modernize and streamline its policies to eliminate this scourge from its projects. For Prostasia Foundation's part, we have implemented industry-standard CSAM detection for one of our own supported projects (MAP Support Club), and received a \$10,000 per month grant from Google to redirect people to professional support services when they search for illegal content.

# Advocacy or attempted normalization of pedophilia, sexualization of minors, or child abuse

Concerns about the normalization of child sexual abuse are a mainstay of opposition to a broad range of social policies, including comprehensive sexuality education, LGBTQ+ books in school libraries, and trans people's access to healthcare. But there is no empirical support for the idea that these policies have the result of weakening social condemnation of child sexual abuse.

<sup>&</sup>lt;sup>5</sup> Lievesley, R., Harper, C. A., & Elliott, H. (2020). The Internalization of Social Stigma Among Minor-Attracted Persons: Implications for Treatment. Archives of Sexual Behavior. https://doi.org/10.1007/s10508-019-01569-x

<sup>&</sup>lt;sup>6</sup> Grady, M. D., Levenson, J. S., Mesias, G., Kavanagh, S., & Charles, J. (2019). "I can't talk about that": Stigma and fear as barriers to preventive services for minor-attracted persons. *Stigma and Health*, *4*(4), 400–410. https://doi.org/10.1037/sah0000154

<sup>&</sup>lt;sup>7</sup> Levenson, J. S., & Grady, M. D. (2019). "I Could Never Work With Those People . . .": Secondary Prevention of Child Sexual Abuse Via a Brief Training for Therapists About Pedophilia. *Journal of Interpersonal Violence*, 34(20):4281-4302. https://doi.org/10.1177/0886260519869238

<sup>&</sup>lt;sup>8</sup> Stelzmann, D., Jahnke, S., & Kuhle, L. F. (2020). *Media Coverage of Pedophilia: Benefits and Risks from Healthcare Practitioners' Point of View. International Journal of Environmental Research and Public Health*, 17(16), 5739. https://doi.org/10.3390/ijerph17165739

<sup>&</sup>lt;sup>9</sup> Knack, N., Winder, B., Murphy, L., & Fedoroff, J. P. (2019) Primary and secondary prevention of child sexual abuse, International Review of Psychiatry, 31:2, 181-194, https://doi.org/10.1080/09540261.2018.1541872

In particular, the phrase "normalization of pedophilia" that the Foundation has used in describing its goals for the child sexual exploitation policy project is a misleading one that we recommend it avoid going forward. As noted above, "pedophilia" and "child sexual abuse" are often wrongly used as synonyms. In a letter of support for Dr. Allyn Walker that I and more than sixty other clinicians and researchers signed in November 2021, we wrote:<sup>10</sup>

De-stigmatization essentially involves increasing the public's understanding about the population being considered. Regarding those attracted to children, as we've seen evidenced countless times over the last few days, the word "pedophile" is misused and misunderstood in public discourse as a synonym for "someone who sexually abuses children." This pervasive misconception, including the ways in which it hinders prevention efforts, is exactly what Dr. Walker's research addresses.

As the appendix demonstrates, editors using terminology such as minor-attracted person, or writing about the work of researchers such as Dr. Allyn Walker who themselves uses this term, have wrongly been targeted as being tolerant of child sexual abuse, when they are not. It is unsurprising that professionals who are trying to prevent people with pedophilia from becoming child abusers would encourage the use of an identifier that isn't considered synonymous with "child abuser".

It is entirely appropriate for the Foundation to ensure that its platform is not misused to sexualize minors or to advocate or promote inappropriate adult-child relationships. However, it is not appropriate for inexact language about "normalization of pedophilia" in Foundation policy to be weaponized against knowledgeable editors who contribute accurate content about how the destigmatization of pedophilia as a mental condition can support abuse prevention efforts.

Twitter's child exploitation policy as introduced in 2019 provides that "Discussions related to child sexual exploitation as a phenomenon or attraction to minors are permitted, provided they don't promote or glorify child sexual exploitation in any way." While Twitter's enforcement of this policy has also been imperfect, its wording properly draws a distinction between discussion of pedophilia and promotion of offending, which we recommend that the Wikimedia Foundation could emulate.

#### Handling situations involving child abuse-related offenses

Just as we support the Foundation's no-tolerance position on CSAM, sexualization of minors, and promotion of inappropriate adult-child relationships, so too we support it taking strict action against users who would misuse project resources to encourage or commit child-abuse-related offenses. As the information above indicates, it is important not to limit these endeavors to those who are identified as pedophiles, because a majority of child sexual offending is committed by those who do not fit this diagnostic label.

 $https://prostasia.org/wp-content/uploads/2022/04/Letter-of-Support-for-Walker-from-Researchers\_Clinicians.pdf$ 

<sup>&</sup>lt;sup>10</sup> See

With that said, substantial evidence exists that untrained Wikipedia community members are not the right parties to be interceding in child protection matters on the platform, as they have shown a tendency towards treating the exercise as a haphazardly conducted vigilante campaign. As the appendix illustrates, many in Wikipedia's community who have attempted to enforce its child protection policy have done so not against child abusers on the platform, but against legitimate editors and even child protection professionals, on the basis of misunderstandings about prevention science.

To avoid similar mistakes being committed in the future, we strongly recommend that enforcement of the Foundation's new child protection policy be reserved to the Trust & Safety team. The Foundation should also provide new guidance to its community that more clearly differentiates between content that actually places children at risk and content that simply discusses pedophilia in scientific terms. This would allow community members to better understand which content and users may be of concern to the Foundation and should be reported. Such guidance should be used to review decisions previously made by community members that have resulted in legitimate editors being maligned and banned.

I hope that this letter has been helpful, and I would be most happy to discuss its contents with you further. You may contact me by email at gilian@prostasia.org with any further questions that you may have, or to set up an appointment for a discussion. Thank you for providing an opportunity to provide this information for your consideration.

Yours sincerely,

Dr. Gilian Tenbergen **Executive Director** 

Dr. Gilian Tenbergen

Prostasia Foundation

# Appendix

## Deleted articles

Name	Archive	Discussion
Minor-attracted person	https://archive.today/6Rc 2a	https://en.wikipedia.org/wiki/Wikipedia:Article s_for_deletion/Minor-attracted_person_(2nd nomination)
		The person who originally nominated this for deletion was later banned as a sockpuppet.
		Final decision was made by Euryalus, who copy-pasted their decision from the stigma of pedophilia article. This raises eyebrows because moderators are supposed to consider each deletion nomination on its own merits. The decision also implied that talking about MAPs somehow equates to claiming that abuse is not harmful.
		Several people supported blocking solely on the grounds that the term is intended to normalize pedophilia, which is not the case. Only users opposing the ban were accused of joining the discussion in bad faith, and moderators ignored bad faith actions by those in support of the deletion, such as blanking the entire article.
		Editors were accused of having an agenda simply because they focused on a topic.
		Some users implied that all of the published paper cited in the article were not reputable, then provided no evidence:
		https://en.wikipedia.org/wiki/Wikipedia:Article s_for_deletion/Minor-attracted_person_(2nd nomination)#Arbitrary_break
		In the middle of the discussion, several users were suddenly banned. All had voted to keep the article.
		Some users pointed out that many in support seemed to have expertise in the

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		field, then implied that was somehow grounds for deletion.
		Several users falsely claimed that the article could be replaced with the existing article on pedophilia, despite the two being non-interchangable topics and having completely different information.
		Some editors implied that those voting to keep the article were a danger to minors in Wikipedia but provided no evidence.
		False claims were present throughout the discussion, but all of the editors who might have called them out were systematically banned.
		Article was deleted and the name was protected so it can't be recreated.
Stigma of pedophilia	https://archive.today/6Rc 2a	https://en.wikipedia.org/wiki/Wikipedia:Article s_for_deletion/Stigma_of_pedophilia
		Many users cited the fact that the page's original creator had been banned, with no mention of the quality of its content.
		A request by editors for moderators to consider that pro-deletion users were engaging in inappropriate tactics to gain support was met with mods accusing the users of being pro-pedophilia and putting a strikethrough in the request.
		Most users who argued for keeping have now been banned for one reason or another.
		One users conflated pedophilia and sexual abuse in their edit vote. When another user attempted to correct them, a moderator told them that they could be banned if they continued. Things got so bad another moderator had to step in.
		Most votes to delete contained little or no explanation and did not attempt to address the detailed reasoning provided by keep votes.

Primary prevention of child sexual abuse	https://web.archive.org/web/20230401122959/https://en.wikipedia.org/wiki/Primary_prevention_of_child_sexual_abuse	https://en.wikipedia.org/wiki/Wikipedia:Administrators%27 noticeboard/IncidentArchive1127#Articles_created_by_22spears  Redirected by mods without any user input, consensus, or specific justification for deleting.	
		https://en.wikipedia.org/wiki/Wikipedia:Redirects_for_discussion/Log/2023_May_17#Primary_prevention_of_child_sexual_abuse	
		Redirect was later deleted in a conversation where a mod repeated claims about the original editor being pro-pedophilia and cited the ban as evidence that the redirect itself was somehow bad even though it was created by mods.	
Allyn Walker	https://archive.today/Fqk Dx	https://en.wikipedia.org/wiki/Wikipedia:Admi nistrators%27 noticeboard/IncidentArchive1 127#Articles_created_by_22spears	
		Most of the article's content was removed by mods.	
		It was later redirected to a page about Allyn Walker's book.	

#### Message that appears on the Talk page for A Long Dark Shadow:



Per the Wikipedia:Child protection policy, editors who attempt to use Wikipedia to pursue or facilitate inappropriate adult—child relationships, who advocate inappropriate adult—child relationships, or who identify themselves as paedophiles, will be indefinitely blocked.

## **Banned Editors**

Username	Ban reason	Admin discussion	Appeal result
So47009  This user made some additions to the page about Dr. Allyn Walker's book and was accused of promoting sexual abuse, despite the book being explicitly anti-contact.	"Abuse of editing privileges" by Courcelles	https://en.wikipedia.or g/wiki/Wikipedia:Admi nistrators%27_notice board/IncidentArchive 1132#Self_report: /re dacted/  Summary: Harassed by mods for promoting claims that are consistent with research, falsely accused of normalizing sex with children and advocating for child pornography. Moderators also claimed that the user was a "danger to children."	No appeal
22spears  This user was involved in editing several pages about MAPs and CSA prevention that have since been deleted	"Pro-pedophilia edits" by PMC The ban message also included a reference to an anime GIF on their pfp.	https://en.wikipedia.or g/wiki/Wikipedia:Admi nistrators%27_notice board/IncidentArchive 1127#Link to person al_blog_of_notorious _pedophile Tom O'C arroll  Summary: User linked to a blog by an abuser and was portrayed as pro-abuse despite stating they didn't support the abuser's stance and linked to it for context only. Moderators seem to directly contradict the UNCENSORED policy. User was accused of pushing a "pro-pedophile" view	User requested that they only be banned from editing the topics where the "violations" took place.  "Contact Arbcom if you want. But no admin will ever unblock you." by Courcelles  Courcelles later banned them from editing their talk page, preventing them from defending themself.

		for sharing accurate information about pedophilia and sexual abuse prevention. One moderator stated that accurate terminology (MAP) is a "POV fork and unacceptably normalizes pedophilia." Another mod claimed they should be banned because they didn't use the word pedophile in an article that was about MAPs, not just pedophiles.  https://en.wikipedia.org/wiki/Wikipedia:Administrators%27_noticeboard/IncidentArchive1127#Articles createdby_22spears  Summary: Coordinated effort by moderators to delete or redirect several articles created or edited by the user, regardless of their contents. At least one very detailed article was completely removed because of a single sentence containing repetitive information.	
86sedan	"pattern of normalizing pedophilia" by Courcelles	https://en.wikipedia.or g/wiki/Wikipedia:Admi nistrators%27_notice board/IncidentArchive 1127#Also_regarding _86sedan Some questionable	User explained that they were not promoting pedophilia, but rather attempting to spread accurate information based on scientific sources.

evidence of ban "Promoting pedophilia is NEVER evasion was provided. Ban does going to be permitted on Wikipedia. I'm not seem to be supported by any also removing talk evidence or page access at this time." consensus. RickinBaltimore Courcelles also chimed in and again accused the user of normalizing pedophilia. User asked moderators to stop defaming them and was silenced through further accusations of rulebreaking. Another user explained that this seemed to be an overreach of CHILDPROTECT. This user has since been banned for something supposedly unrelated. **Qirtaiba** "it doesn't matter if it's https://en.wikipedia.or User explained his q/wiki/Wikipedia:Admi nuanced and role as a child nistrators%27 notice A child protection incremental when the protection board/IncidentArchive professional who was overarching aim is professional and 1127#Also Qirtaiba ( banned after the same, as with remarked that the Jeremy Malcolm) an speaking up in your so-called 'child mention of his defense of a page protection' d R alvarez02 organization in the with accurate organization" by EI C block reason seemed information. No evidence provided to constitute a by moderators personal vendetta by a moderator. https://en.wikipedia.or "Your CV is g/wiki/Wikipedia:Admi nistrators%27 notice irrelevant. As board/IncidentArchive explained in our child 1127#Related matter protection policy, we Qirtaiba unblock r have zero tolerance

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		equest  Once again, no real evidence was provided. Instead, moderators started talking about a different user who was not involved in the matter. One moderator specifically mentioned an underlying goal of blocking people involved with a specific child protection organization  https://en.wikipedia.org/wiki/User_talk:El_C #User:Qirtaiba  Moderators also removed a link from a user's page despite having no evidence it contained rulebreaking content	for paedophile advocacy, broadly construed, and EI C's grounds for blocking you are plain to see in your editing history here." by Joe.  The user appealed again, pointing out that his previous appeal was dealt with improperly (moderators coordinated to keep him banned) and further explaining that he had not violated the policy that they claimed.  "Upon review, I believe that the block was correctly made." by 331dot  The user's talk page access was later revoked when they tried to keep others informed about their efforts to correct the erroneous block.
R alvarez02	"advocacy in violation of the Wikipedia:Child protection policy" by EI_C	https://en.wikipedia.or g/wiki/Wikipedia:Admi nistrators%27_notice board/IncidentArchive 1127#Also_Qirtaiba_( Jeremy_Malcolm)_an d_R_alvarez02 https://en.wikipedia.or g/wiki/User_talk:El_C #User:Qirtaiba Seems to have been banned solely for linking to the same page as another	No appeal

		banned user, with no explanation given for why the page was problematic.	
Observer42436	Seems to have been blocked for voting to keep an article that mods did not like  "Disruptive edits" by Euryalus  The banner also commented "Some licence is given for people to express personal opinions, but Wikipedia is not the place to advocate for distigmatising pedophilia. Your account has been blocked per this policy."  Another user spoke up to say this was a misapplication of the policy.	None found	User explained that they were not trying to push a point of view, but rather spread awareness of research that could help keep kids safe.  "I concur with B-S-Z below; Wikipedia is not the place to right great wrongs- if that's what this is. I think that the policy was correctly applied." by 331dot.  Mods seem to conflate spreading accurate information with activism to justify denying the appeal.

Wikipedia administrator refers to medical terminology as "odious" and compares child protection efforts to pro-abuse efforts

I want to push back on @GabberFlasted's comment saying WP:CHILDPROTECT says that "advocating for any kind of child sexuality is not to be accepted". This is incorrect. CHILDPROTECT bars the advocacy of adult-child sexual relationships. We have plenty of articles about children's sexuality (e.g., child sexuality, adolescent sexuality, statutory rape, incest, lolicon, sex education, age of consent, and even jailbait) and we must allow the constructive discussion of the topics with sources to improve the encyclopedia. And that includes controversial and odious things like so-called MAPs and NAMBLA. What we cannot allow is POV pushing promoting pro-pedophilia views while working on these topics. The question here is: has So47009 engaged in such POV pushing? EvergreenFir (talk) 22:23, 27 June 2023 (UTC)