

[The following memo was emailed to Karina Newton, Head of Public Policy, and Vaishnavi J, Head of Youth Wellbeing at Instagram, on November 30, 2021. Some edits – such as bolding – were made after the email was sent to emphasize key points for the reader or to redact references that would reveal information shared in confidence. Faces in photo evidence blurred by NCOSE to not re-exploit victims]

November 30, 2021

Dear Karina and Vaishnavi,

We'd like to express our gratitude to Instagram for the improvements made this past year to reduce the likelihood of exploitation on your platform: in particular, blocking adults from direct messaging unconnected minors (which we know is a primary grooming method), increased warnings to young people about connected adults exhibiting suspicious behavior, defaulting accounts for new 13 – 15-year-olds to “private,” and requiring birthday entry upon account creation. We are hopeful that these common-sense measures will in fact limit access by predatory adults to kids and will “nudge” younger people in making better decisions they may otherwise would not have considered.

Yet while we have applauded these measures publicly, we must stress that privately we find they are not nearly significant enough – nor are they being rolled out quickly enough given the exponentially increasing crisis of child sexual exploitation. We understand that changes take time. **Yet Instagram's response seems almost lethargic considering the platform has been and continues to be cited as a top tool for a host of crimes and illegal behavior against children.**

Just this past May, the [2020 Federal Human Trafficking Report](#) released by the Human Trafficking Institute found that 65 percent of child sex trafficking victims recruited on social media were recruited on Facebook, with Instagram cited as the second most frequently used platform. Leading child safety organization, Thorn, surveyed children ages 9 – 17 and found that 13% of Instagram users cited they had an online sexual interaction **with someone they believed to be an adult**. Thorn notes that Instagram and Snapchat “appear to **host the highest concentration of sexually explicit interactions between minors and adults.**” (page 15). 1 in 5 Instagram users had a sexual interaction the platform (22%) had an online sexual interaction (including being asked to send a nude photo or video) and 26% said they had a “potentially harmful online experience” on the platform.

The youth of Courtney's House can attest that they continue to be coerced by their exploiters into posting sexually explicit images on Instagram. Sometimes their pictures are posted and accounts are run *by* their traffickers – even when the minor is no longer in the situation or even on Instagram. Those images are neither proactively removed quickly enough by Instagram, nor is the reporting process sufficiently addressing the concerns of exploited youth: a problem we've raised with Instagram repeatedly.

Furthermore, the recent revelations unveiled by Frances Haugen and the Senate Commerce hearings have underscored what our group – and countless others – have suspected and have

been saying for years: Instagram has consistently chosen profit over child protection and well-being. As one senator put it, we too “were shocked, but not surprised” at the extent Facebook and Instagram knew, *through its own research*, the harms it perpetuated on its young users. The mental health harms unveiled were disturbing in their own right – but even more so given that **the vulnerabilities Instagram *has actually created* makes kids more susceptible to grooming, sexual exploitation, sex trafficking and sexual extortion – all of which are rampant on your platform.**

Yet neither during nor since the Senate hearings has Facebook or Instagram taken responsibility or apologized for its grave failings or announced plans to use its near-limitless resources to drastically alter the “perfect storm” it has unleashed against its young user’s health and wellbeing. Rather, Instagram’s parent company chose this moment in time to launch a massive rebrand, announce Link stickers on Instagram Stories (replacing the “swipe up” option so popular with pornography creators with an even more expanded option), and test a [subscription-based feature](#) modeled after [OnlyFans, a company under fire for extensive](#) child sex abuse material, image-based abuse, sex trafficking, and insufficient moderation – grave issues Instagram hasn’t yet resolved on its own platform!

Despite incredible pressure from our supporters and ally organizations, our collective group has refrained from relaunching the widescale public #WakeUpInstagram campaign due to the changes your company *has* made, and because of our long-standing relationship with both of you, Karina and Vaishnavi, and our belief that both of you care deeply about making things better for kids. However, in light of the recent revelations, the fact that other social media companies have outpaced Instagram in implementing changes to make their platforms safer for kids, and that no significant reform has been announced, **we are feeling the weight of our own moral obligation to speak more broadly and publicly about the dangers on Instagram and rally people to push for policy changes.**

We hope to hear of substantive changes with concrete timelines when we speak on Wednesday. More importantly, we – together with survivors, child online safety activists, policymakers, law enforcement, and parents around the world – will be attentively listening to Adam Mosseri’s testimony in front of Congress on December 6 for commitments by Instagram to make the platform *inherently* safer for children, no matter the cost.

Below are our remaining concerns and recommendations. We look forward to discussing them in depth with you.

Best,

Collective Shout
Courtney’s House
Defend Dignity
National Center on Sexual Exploitation

Recommendations to Increase Child Safety on Instagram

1. Invest in and expand use of existing technology to scan for sexually explicit images in posts and messages
2. Prioritize using and/or creating tools to prevent, identify, and remove content, hashtags, and comments that sexualize children on minors' accounts, as well as on managed accounts for children 12 and under. Remove and block offenders.
3. Prohibit content sexualizing minors
4. Remove or limit risk-accelerating features for minors, especially 13 – 15-year-olds
5. Create pin-protected caregiver controls
6. Simplify process for reporting an under-13 user on Instagram
7. Prevent pornography and prostitution companies from having accounts –at the very last blocking them from underage users
8. End plans for Instagram for Kids
9. Cease the release of new features before sufficient capabilities to scan for and moderate illegal and harmful content.
10. Increased resources (including in-app) for caregivers and users

1. Invest in and expand use of existing technology to scan for sexually explicit images in posts and messages

Survivors of sex trafficking share that sexually explicit images of them taken by their traffickers continue to be posted and reposted across Instagram – even when the child is able to leave the trafficker. Pimps will often leave their victims' pages up, using it as a marketing and grooming tool. Given the exponentially rise in child sex abuse material and non-consensually shared images, Instagram should prioritize expanding use of existing technology, including AI, to scan for and remove sexually explicit images/nudes and remove and block the offending users.

2. Prioritize using and/or creating tools to prevent, identify, and remove content, hashtags, and comments that sexualize children on minors' accounts, as well as on managed accounts for children 12 and under. Remove and block offenders.

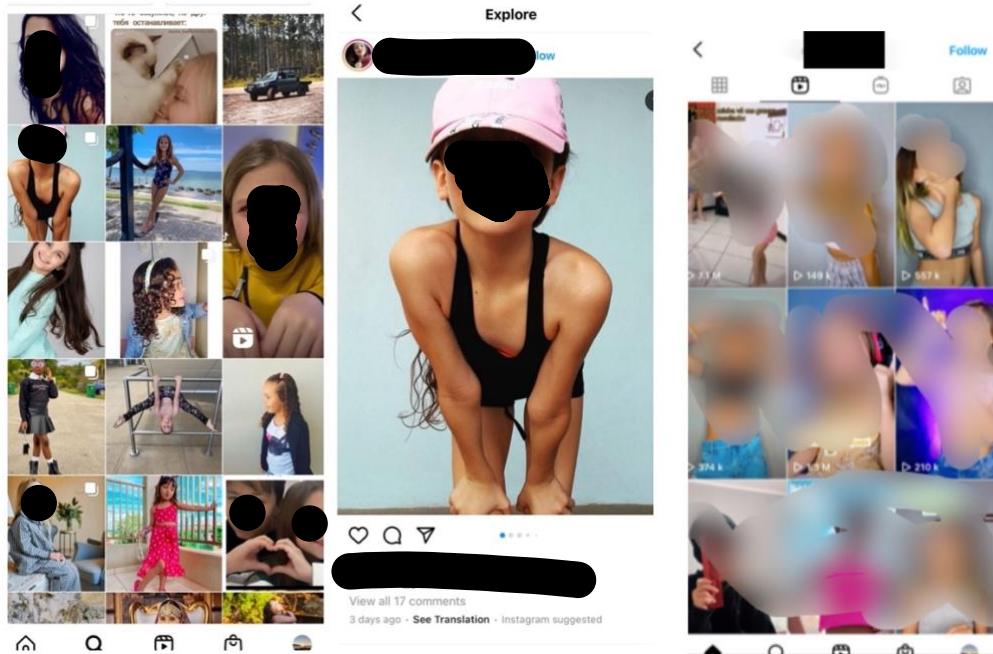
[screenshots below taken by Collective Shout]

Sexualization and sexual exploitation of children continues to be a serious problem on Instagram. While some children are themselves posting sexualized content, hashtags, or comments, we know that adults are using your platform to normalize the idea that children are sex objects, grooming children through comments (and still through DMs even with the new policy) and using Instagram to sell children's images or children themselves. Greater restriction by Instagram on the type of content allowed, as well as expanded use of technology to identify and remove material could significantly reduce the access by predators to children – including pedophiles, pimps, and sex buyers.

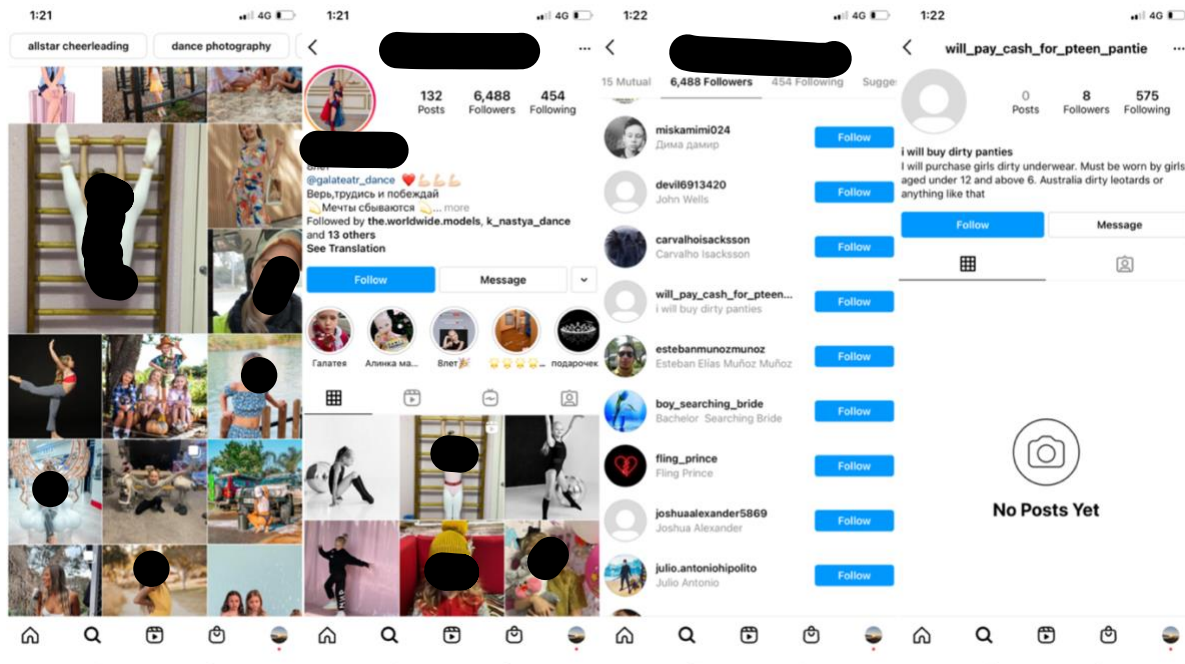
Repeat offenders posting sexualized comments should be barred from the platform and “suspicious adults” should be prevented from commenting on minors' content, as well as on managed accounts for children 12 and under.

Please prohibit re-sharing or re-posting minors' content, or content portraying minors, without permission.

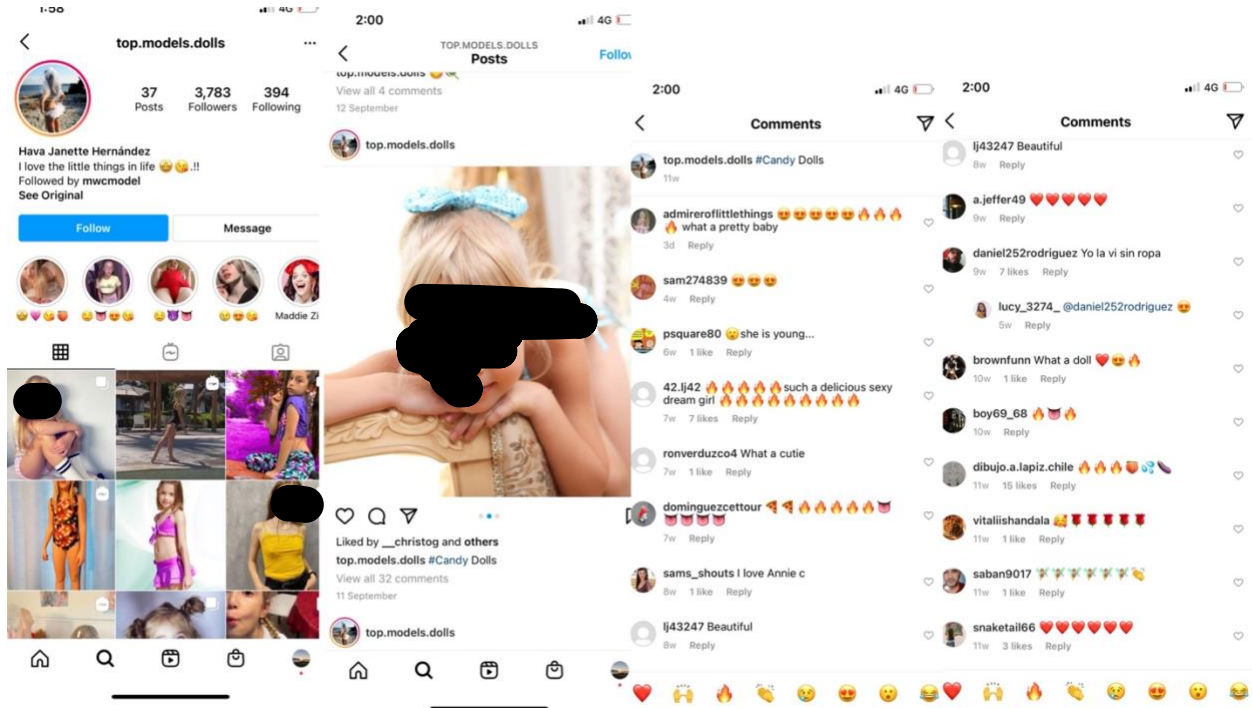
Minors including pre-teens are still being recommended via Explore, Suggested for You, and (particularly concerning) Reels – where pre-teens are essentially providing sexual entertainment for men. Some girls have hundreds of thousands of followers and millions of views on their Reels.



Pre-teen girls followed by/targets of approaches from predators.



Accounts operating as pedophile networks



Please see attached document to see screenshots of the following:

- Account operating as pedophile forum with attached Telegram chat group
- Examples of predator page following numerous pre-teen girls
- Examples of underage girls whose Instagram accounts is used to sell sexualized content via subscriptions, personal web pages, direct payment and gifts-in-kind (Amazon gift purchases, gift cards, etc.).

Hashtags also remain a serious concern, given the ease with which they connect predators with children.

Collective Shout frequently documents incidents where men make sexualized/sexual abuse/predatory comments to underage girls, and the account owner ‘likes’ the comment.

In October Collective Shout reported over 130 accounts to NCMEC for predatory/sexualizing activity of a minor.

Outstanding questions related to this issue:

- a. *What metrics are being used to decide what is or is not considered sexualized*
- b. *What is the verification process for accounts of minors run by adults?*
- c. *Are “suspicious adults” (as defined by Instagram) blocked from accessing managed accounts of children under 13?*

3. Prohibit content sexualizing minors

Related to the point above, Instagram should expand its Community Guidelines to prohibit hashtags, emojis, usernames, etc. that sexualize minors. While we appreciate the warnings that now appear on searches such as “teen pornstar” or “teen porn,” allowing those terms at all diminishes the gravity of a criminal act and normalizes a growing crisis. That’s the “best case” scenario. At worse, that content is being used to signal to predators of available CSAM, trafficking victims, etc.

We recommend reviewing TikTok’s expanded Community Guidelines as a bare minimum comparison.

4. Remove or limit risk-accelerating features for minors, especially 13 – 15-year-olds

The industry is moving toward limiting or removing some features all together for minors that have proven to be high risk. We appreciate the steps taken to default some features – like “privacy” for new users 13 – 15 and encourage Instagram to continue assessing each available feature and whether adjustments need to be made for minors; including implementation of a graduated approach which could significantly improve the safety of young teens who are new on their digital journey and lack the brain development to fully understand risks and consequences.

- a. **Stop recommending unconnected adults to minors in “Discover People.”** As many young people are in a social-media arms race with their peers to have as many followers as possible, this feature encourages them to befriend strangers. Even adults connected to friends are not friends. They are strangers.

- b. **Restrict all adults from seeing minors in “Suggested Users” or “Discover People”** We thank Instagram for making it harder for “suspicious adults” from seeing teen accounts. We recommend expanding this to prevent all adults from seeing minors’ accounts. If a minor knows an adult in real life, they can very easily obtain their user information and connect that way – and vice versa.
- c. **Disable Vanish Mode** which is often used to send sexually explicit images and/or hide dangerous interactions
- d. **Remove DM ability for 13 – 15-year-olds altogether** (as TikTok has done) given the high risk and reality of grooming and exploitation through this feature. If Instagram continues to move toward end-to-end encryption, considering this option becomes even more crucial for child safety.
- e. **Remove the ability for any unconnected adults from commenting on minor’s posts, even if the account is public**

5. Create pin-protected caregiver controls

Instagram has proven to be dangerous for children. And while we advocate for greater responsibility by Instagram itself in amending problematic features, we also advocate for the critical need for parents and caregivers to have more options in protecting their children and managing their online experiences. It’s past due for Instagram to develop tools that allow greater oversight to caregivers. Tools could include a graduated approach, with greater oversight available for 13 – 15 – year – olds who are early in navigating the digital landscape. At the very least, caregivers should have the option of being alerted when settings (such as privacy) are changed, or new connections are made.

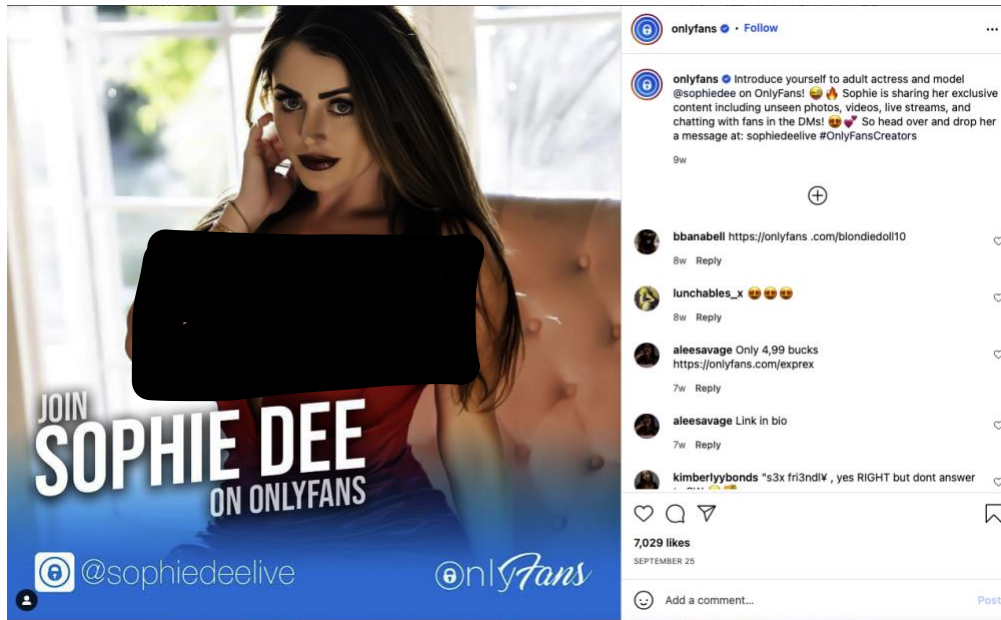
We’ve heard Instagram argue against pin-protected controls saying this option may be used to assert greater dominance by domestic abusers, traffickers, and other perpetrators over their victims. While this may be the case, it is a small percentage of people whose abusers already likely have all of their account information (passwords, etc.) and are monitoring their every move. We recommend creating features that could protect a large majority of your users from finding themselves in risky or dangerous situations in the first place.

6. Simplify process for reporting an under-13 user on Instagram

The current process to report an account of someone aged 12 or under is overly burdensome and should be rectified given Instagram’s own admission that there are countless young children on the platform. [redacted as it reveals confidential information relayed to NCOSE by Instagram].

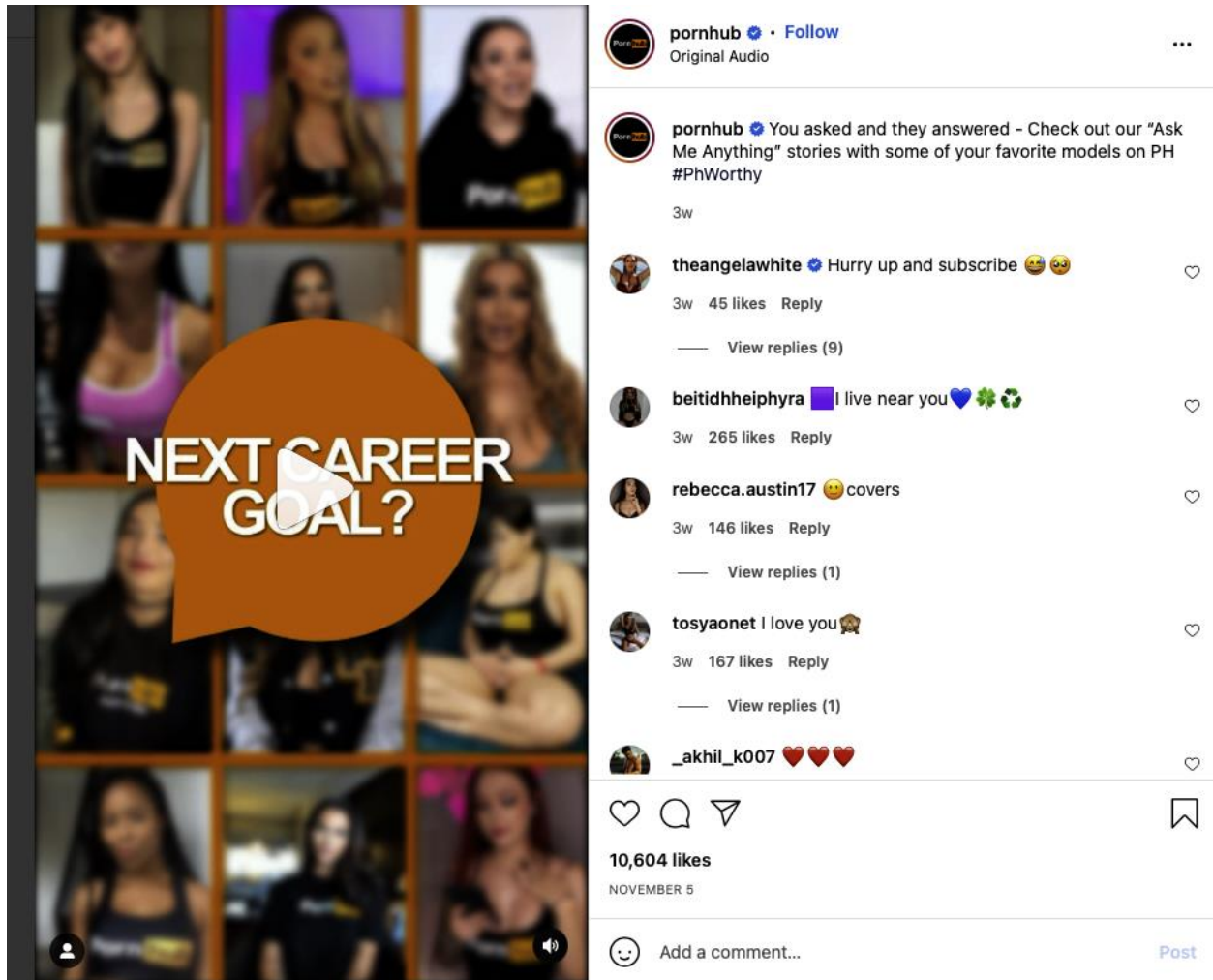
7. Prevent pornography and prostitution companies from having accounts –at the very last blocking them from underage users.

At the exact instant Antigone Davis was testifying to Congress that Instagram was committed to creating “an age-appropriate experience for children,” [redacted] was on the OnlyFans page through her fake Instagram account (as a 14-year-old) seeing this advertisement (text reads: *Introduce yourself to adult actress and model @sofiedee on OnlyFans*)



In 3 clicks, [redacted] was on Sophie Dee’s OnlyFans page that was promoting a free month’s pass to her “premium” content. OnlyFans is currently under fire by the FBI, members of Congress, and the media for hosting [child sex abuse material, used for sex trafficking and prostitution, rife with non-consensually obtained content, and purposely negligent moderation policies](#). We also know from law enforcement and survivors that Instagram is a primary platform that OnlyFans creators use to recruit new members – as it is structured as a pyramids scheme and creators have a vested interest in attracting as many new creators as possible: including minors.

Pornhub is also under investigation for knowingly hosting child sex abuse material, sex trafficking, rape, and nonconsensually shared videos and images. And while the content on Instagram’s Pornhub channel may technically not be considered porn, it is very sexually graphic and not only directly promotes pornography (which research shows can be incredibly harmful, especially in the brain development of young people), but also features videos like “Next Career Goal” encouraging becoming a pornography performer.



Several mainstream corporations like Visa, Mastercard, Comcast, Roku, Heinz, Unilever, Paypal, etc. have cut ties with Pornhub.

Why hasn't Instagram?

Instead, you have graced these known pornography and prostitution companies – ones that show strong evidence of illegal activity against children and adults alike - the coveted “blue check” of a verified account, which for all intents and purposes is a stamp of honor, approval, and legitimization.

Instagram must bar any prostitution or pornography companies from holding accounts at all – let alone allow them to be accessed by minors.

8. End plans for Instagram for Kids

As you know, our organizations have joined countless other child safety and privacy organizations and experts, attorneys general, members of Congress, and law enforcement calling on Instagram to scrap this ill-devised and irresponsible plan. Rather than building a new product

to “hook” kids at even younger ages, Instagram should prioritize stemming the rampant sexual abuse and exploitation of the many minors currently on Instagram.

9. Cease the release of new features before sufficient capabilities to scan for and moderate illegal and harmful content.

As Instagram begins planning for new features, such as the subscription-based feature, they must reach out to those with lived experience and other experts to share how the feature may be misused and have potential unintended consequences. We’re concerned that this new feature will be abused by exploiters as OnlyFans has. More importantly, features should not be rolled out without sufficient capabilities to scan for and moderate illegal and harmful content.

10. Increase resources (including in-app) for caregivers and users

We’re still not seeing any type of messaging in-app or in Parent’s Guide about risks of using Instagram, including information and resources on grooming, sex trafficking, CSAM, sextortion and other threats known to exist on your platform. When are those coming?

Instagram also [announced in March](#), and Vaishnavi shared, that minor accounts that were set to “public” would receive a “notification later on highlighting the benefits of a private account and reminding them to check their settings.” [redacted] recently received a notification on her fake, public, minor account that encouraged her to create a new, private account.

Outstanding questions: Is this what Instagram meant in the statement above about highlighting benefits of a private account?