

Terminology:

It is observed that some countries are adopting other terms instead of “child pornography” as the term potentially mislabels the related materials as legally accepted forms of pornography. “Child pornography” misrepresents the acts of producing, distributing or possessing such materials as being trivial when these acts are in fact child sexual abuse.

We recommend adopting the term “child sexual abuse material” in our legislation as it is a clear indication of the sexually exploitative nature of such materials. This term, or its acronym, CSAM, will be used throughout the paper in place of “child pornography”.

Executive Summary

Singapore Children’s Society is supportive of the Singapore government’s efforts to draft dedicated legislation against child pornography (henceforth referred to as **child sexual abuse material**, or **CSAM**). Our organisation also recognises the need to enact specific, comprehensive laws concerning CSAM such that penalties commensurate with the severity of offences.

This paper details our **key recommendations** for laws against CSAM, including:

- I. The need to define “child sexual abuse material” and to penalise the production, distribution and possession of such material;
- II. Mandate reporting of knowledge of, or suspected CSAM, for certain professions and organisations;
- III. Establishment of data retention and data preservation frameworks to aid investigation;
- IV. The need for extraterritorial jurisdiction in the prosecution of such offences; and
- V. Criminalisation of online sexual grooming offences that do not transit offline.

Specific to **law enforcement**, we propose that the relevant agencies implement child-centric investigation procedures and partner with technology companies to combat online CSAM.

Lastly, we also offer suggestions for **public education** on the subject of CSAM; for the rehabilitation for offenders and would-be offenders; and for the establishment of community-based services to support child sexual abuse victims.

Preamble

1. Singapore Children’s Society supports the Singapore Government’s efforts to draft dedicated legislation against child sexual abuse material.
2. Globally, the issue of online CSAM has grown over the years. In 2016, the Internet Watch Foundation found that [Singapore hosted 12 per cent of nearly 2,000 webpages](#) (Seow, 2017) containing images of child sexual abuse across Asia. While the hosts of these webpages may not be physically based in Singapore, it goes to show that this is a trans-border problem which requires all countries to work together to put in place comprehensive laws that can contribute to tackling the problem, and to anticipate new threats.

Recently, there has been a spate of microblogs publishing pornographic content involving children and youth in Singapore. These microblogs, hosted on content-sharing site Tumblr, misuse everyday photos through the posting of lewd or offensive comments (Aw & Tan, 2018). There needs to be more protection in place for our children and youth who might unwittingly find themselves the subject of sexualised content online.

3. Currently, the offending acts relating to CSAM are offences under the following legislations:

<i>Act/ Code</i>	<i>Section(s)</i>
Children and Young Persons Act (Chapter 38)	5 - Ill-treatment of child or young person 7 - Sexual exploitation of child or young person
Films Act (Chapter 107)	29 - Offences involving dealings in obscene films 30 - Possession of obscene films 31 - Advertising obscene films 32 – Offences involving children and young persons
Penal Code (Chapter 224)	292 - Sale of obscene books, etc 293 - Sale, etc., of obscene objects to young person 375 to 377D – Sexual offences
Undesirable Publications Act (Chapter 338)	11 - Offences involving obscene publications
Women’s Charter (Chapter 353)	Part XI Offences against Women and Girls
Broadcasting Act (Chapter 28)	Under the Internet Code of Practice promulgated by section 6

4. Under our current legislation, “obscene materials” are those that would deprave or corrupt the persons who read, see or hear such materials. They may include sexualised materials portraying adults or children, but the resulting penalties for these offences are the same whether the people involved are adults or children. However, there ought to be harsher punishment for materials depicting children, as they are certainly more severe since they constitute child sexual abuse or the support thereof.
5. Child sexual abuse materials victimises a vulnerable group in our population incapable of consent. Research has shown that some offenders show CSAM to young people online in order to groom, exploit and desensitise them to sexual activity, even to the extent of pressuring them to engage in the production of more indecent material online (Sheldon, 2011).
6. As our laws do not address CSAM directly, the penalties do not commensurate with the severity of the crime:
 - a. In the case of [Ong Yi Jie](#) (Chelvan, 2018), he installed hidden cameras in public toilets and changing rooms, capturing over 200 obscene voyeuristic films of girls and women. He also shared and traded these videos on a sex-themed online forum. Many of these videos clearly showed the faces of the victims. It is near impossible for the videos to be removed from the internet and the victims will be subjected to continued trauma. However, Ong was only sentenced to a three year jail term, the bulk of the sentence arose from the charge of insulting the modesty of women and girls.
 - b. Another example is the case of [Joshua Robinson](#) (Chelvan, 2017), which saw the biggest haul of CSAM videos from an individual in Singapore (321 videos), but for which he was only sentenced to six months’ jail for possession of obscene films under the Films Act.
7. Besides criminalising the production and distribution of CSAM, it is also pertinent to criminalise the possession of CSAM, as this may potentially evolve into more serious crimes. There is evidence to suggest that a proportion of offenders found in possession of child sexual abuse material pose further risks to children through the perpetration of contact abuse, for instance through coercing or enticing a child or young person to take part in sexual activities (Seto, Hanson & Babchishin, 2011). This is illustrated in a local case involving [Chan Chun Hong](#) (*Chan Chun Hong v Public Prosecutor* [2016] SGHC 75). His addiction to CSAM eventually led him to organise a child sex tour.

Recommendations for Legislation on CSAM

8. There is a need for Singapore to enact specific, comprehensive laws concerning CSAM.
9. Countries around the world have amended and strengthened their legislation where CSAM is concerned, while also taking into account the influence of technology in these crimes. For instance, Hong Kong enacted the Prevention of Child Pornography Ordinance (Cap. 579) in 2003. The Philippines has also enacted the Anti-Child Pornography Act, 2009 (R.A. 9775). Several states in Australia have amended their legislation, with the state of Victoria introducing the Crimes Amendment (Sexual Offences) Act 2016 (No. 47 of 2016) to consolidate sexual offences against children.
10. Drawing from the experiences of other countries as well as from relevant research, below are some key recommendations for consideration.

10.1 Provide clear definitions in the proposed statute and to criminalise the production, distribution and possession of CSAM

A comprehensive definition of CSAM is necessary to address the objectionable nature and harm, so as to warrant a higher degree of punishment. We need to define who a “child” is, and to define what constitutes “child sexual abuse material”.

a. Definition of “child”

The United Nations defines a child as anyone below 18. Under our Children and Young Persons Act (CYPA), however, a child is defined as someone below the age of 14 and a young person is between 14 and 16 years old. For consistency purposes, we suggest following the definitions of children and young persons already set out in the CYPA. Accordingly, the younger the child being depicted in the CSAM, the more severe the punishment should be.

b. Definition of “child sexual abuse material”

The United Nation’s Optional Protocol to the Convention on the Rights of the Child on the Sale of Children, Child Prostitution and Child Pornography (2018) defines “child pornography” as any representation, by whatever means, of a child engaged in real or simulated sexual activities or any representation of the private parts of a child for sexual purposes.

Additionally, the International Centre for Missing and Exploited Children (ICMEC, 2016) recommends for the definition to cover the **forms** that CSAM can take (such as DVDs, data files, and other forms of electronic or digital media) and the **methods** by which it can be produced and distributed (increasingly via computer networks and the Internet). Possession of CSAM, such as knowingly viewing or knowingly downloading an image from the internet, must also be criminalised.

These are good guidelines for us to consider as they underscore the need to be able to prosecute the full spectrum of actions, from production, distribution to possession of CSAM.

In addition, some countries are adopting other terms instead of “child pornography” as the term potentially mislabels the related materials as legally accepted forms of pornography. “Child pornography” misrepresents the acts of producing, distributing or possessing such materials as being trivial when these acts are in fact child sexual abuse. “Child pornography” does not convey the worrying fact that more demand for the viewing of such materials would consequently mean that more children will be exploited to produce them.

To this end, Australia has replaced “child pornography” with “child abuse material” in its Crimes Amendment (Sexual Offences) Act 2016 (No. 47 of 2016) because the production of such materials would definitely have involved the abuse and exploitation of a child. Under this definition, the materials encompass the torture, cruelty or physical abuse of the child victim, as well as exposure of the private parts of the child. The United Kingdom refers to such materials as “prohibited” or “indecent” in different legislation, such as the Coroners and Justice Act 2009 (Cap. 25), the Protection of Children Act 1978 (Cap. 37) and the Criminal Justice Act 1988 (Section 160). CSAM has also been adopted by agencies such as ECPAT International.

c. Categorising the severity of CSAM

The COPINE scale [**Annex 1**] is used as a reference in several countries as a way to categorise the severity of child sexual abuse images. It provides helpful inputs in determining if an image is considered as CSAM, and how heavy the ensuing sentence should be if someone is found to be in possession, distribution or production of such materials.

d. Exclusions

It is pertinent that the child or young person who appears in CSAM is not penalised. The legislation should further offer protection in instances when children are involved in non-exploitative sexual conduct. The Crimes Amendment (Sexual Offences) Act 2016 (No. 47 of 2016) that the state of Victoria in Australia has adopted included such exceptions to avoid unwarranted serious consequences on teenagers who create, possess or distribute explicit images of themselves or their peers due to consensual sexting between peers.

10.2 Mandate reporting of knowledge of, or suspected CSAM, for certain professions and organisations

ICMEC's (2016) guidelines state that those who should be required to report knowledge of, or suspected CSAM activities and offences to law enforcement include:

- a. Individuals who, in their everyday, professional capacity, come into contact with children and owe a certain duty of care to those children. These include healthcare, education and social service professions.
- b. Individuals who, in their everyday, professional capacity, do not come into contact with children, but may potentially be exposed to CSAM as a result of their job responsibilities. These consist of mainly IT professionals.
- c. Organisations or corporations whose services are being used to proliferate CSAM or related activities. They should exercise a certain amount of industry responsibility/ corporate citizenship/ corporate social responsibility in their day-to-day business operations. These include the Internet Service Providers (ISPs), search engines, software companies, social media companies, credit card companies and banks.

In addition, ISPs should be legally obliged to undertake content management to uncover CSAM offences. There is a need to enhance the existing Internet Code of Practice for our local ISPs to take a more proactive role in monitoring, reporting and removing CSAM. At present, our ISPs typically deny access to sites only when directed to do so by the authorities (Info-communications Media Development Authority, 2016). A stronger system would be one where CSAM is removed at the source, such as through blocking access to websites and de-registering domain names that distribute such content. Financial institutions should also be obliged to cease and report monetary transactions which facilitate access to CSAM (The Protection Project & ICMEC, 2013).

Furthermore, and in accordance with the CYPA, parents and guardians have the primary responsibility for the care and responsibility of children. As such, these caregivers should be obliged to report suspected CSAM-related activities and offences.

10.3 Establish data retention and data preservation frameworks to aid the investigation of CSAM

Besides imposing legal obligations on ISPs to report CSAM detected in their networks, law enforcement authorities should ensure that the ISPs retain content-based data and non-content based data for a specific period of time, in order to facilitate criminal prosecution. Content-based data relates to information such as email texts, images and videos. Non-content based data relates to subscriber information (the subscriber's identity, IP address, etc.), traffic data (the route, type, time, date of communication, etc.) and location data.

Law enforcement agencies should seek to increase cooperation with the ISPs, and engage their technical capabilities and tools to search and seize computer data. Data retention refers more specifically to the retention of the non-content data of *all users* from the point of collection, while data preservation refers to the preservation of the data of *identified users* who are under investigation (ICMEC, 2016).

Currently, the police have powers under the Criminal Procedure Code (Chapter 68) to prohibit the disposal of property; which has a broad definition that includes electronic evidence. This means that all evidence relating to criminal cases must be retained for investigation. However, ISPs should be further obliged to preserve all computer data in relation to a report of CSAM. This would prevent the loss of crucial data that would hinder the investigation process. Measures should also be put in place for the removal and destruction of the content-based data (child sexual abuse materials) once it is not required for investigation purposes, in respect of the child's right to privacy.

10.4 Provide for extraterritorial jurisdiction in the prosecution of CSAM offences

The advent of the Internet and other digital technologies has broken down geographical boundaries, enabling perpetrators ease of access to children from all over the world. As such, our legislation on CSAM should cover offences regardless of where the crime is committed. It should be applicable to all citizens or permanent residents of Singapore, whether the party is an offender or a child victim. Such offences should be included as an extraditable offence in our extradition treaties. Trans-border co-operation between foreign and international law

enforcement agencies should also be enhanced through data exchange and technical assistance in gathering evidence for criminal proceedings (The Protection Project & ICMEC, 2013).

An example of this co-operation is that of Richard Huckle, a British paedophile who was convicted of 71 offences against Malaysian children aged between six months and 12 years old. In 2014, Australian investigators initially tracking the activities of another paedophile who ran a child sex abuse site on the dark web found that Huckle was a prolific user of this website (McVeigh, 2016). The Australian authorities then tipped off their British counterparts at the National Crime Agency (NCA) and the NCA subsequently used their extraterritorial legislation, under Section 72 of their Sexual Offences Act 2003 (Cap. 42), to prosecute Huckle in the UK for the offences he committed overseas. As a result, Huckle was sentenced to at least 25 years in jail.

10.5 Criminalise online sexual grooming offences that do not transit offline

On a related note, there is a need to review our existing law on online sexual grooming. The current legislation on the sexual grooming of minors under the age of 16 (section 376E of the Penal Code) is contingent on the offender actually meeting, or having an intention to meet, the child in person. However, ICMEC (2017) cited recent reports which have shown that an increasing number of grooming cases take place entirely online, with the offender obtaining sexual gratification through non-contact sexual offences— without meeting the child face-to-face. Examples include getting the child to send sexually explicit images, perform sexual acts over a webcam, or participate in sexualised conversations via chat, text or email.

It is clear that online grooming may potentially lead to the production of CSAM. To better protect children from sexual exploitation, the existing laws on sexual grooming should cover online non-contact sexual offences as well; *regardless of whether the offender intends to meet the child offline*. This will allow for the criminalisation of latent, undetected sexual offenders who would otherwise evade punishment.

Legal provisions should also be made to recognise online sexual grooming as a standalone offence, instead of addressing it as an element of another offence. This is because online grooming in itself, specifically the example illustrated above, can already be exploitative of children. The UK, for instance, has made it a criminal offence for adults to engage in sexual communication with children. This law was passed as part of the Serious Crime Act 2015 (Cap. 9).

Law Enforcement

11. With the enactment of CSAM legislation, there will be a concurrent need for law enforcement officers to be equipped with the knowledge and skills to handle such cases on the ground.

11.1 Implement child-centric investigation procedures

It is essential that officers who interface with young children are trained in child development and in questioning techniques. The recent revisions to the Criminal Procedure Code for sexual crimes have established better processes for interviewing children. In addition, we suggest forming a specialised team of Investigation Officers, whose work processes would tie in closely with that of the Ministry of Social and Family Development's (MSF) Child Protection Officers, to handle the interviewing of young children.

Children's Society understands that the Police's Criminal Investigation Department has started preliminary joint discussions with various stakeholders such as the AGC, MSF and representatives from the KK Women's and Children's Hospital to explore developing a multi-disciplinary interviewing process for young victims of sexual offences. We are also aware that MSF is in preparations to roll out the Sector Specific Screening Guide for the Police to better handle abuse-related concerns among children and youths. Hopefully, through greater inter-agency coordination and capacity building initiatives, we will be able to ensure the implementation of child-centric investigation procedures in time to come.

11.2 Partner with technology companies to combat online CSAM

Perpetrators often take advantage of the anonymity that the internet provides to hide their tracks. The dark web itself involves the use of highly sophisticated encryption software so that these perpetrators remain undetected. Consequently, there is a need to tap on the expertise of tech companies to overcome possible barriers in the investigation of online CSAM.

Thorn, a NGO based in the United States, pointed out that law enforcement agencies typically do not have the ability or resources to sift through the sheer volume of CSAM online to identify the relevant victims and offenders. As such, Thorn works with tech companies to leverage video and imaging technologies in the fight against child sexual exploitation, including child sex trafficking. It spearheaded Project VIC to facilitate data-sharing between law enforcement agencies worldwide, in order to increase the number of victims identified and rescued.

Project VIC (2018) has developed new standards for law enforcement data through the creation of the *Video Image Classification Standard*, or VICS. When a computer containing CSAM is seized, the *Project VIC* database is able to sort and eliminate images where the victims have been previously identified. This enables investigators to focus their efforts on uncovering new victims. Project VIC also utilises innovative software that allows investigators to zoom in on photos and pick up details (such as fingerprints) that the naked eye might not see (Tumulty, 2018). As part of Project VIC, Thorn offers international training programmes through partnerships with the National Criminal Justice Training Center and the ICMEC.

Working in partnership with tech companies and NGOs such as Thorn will improve the efficiency and efficacy of the investigation process, so that victims receive the necessary intervention and offenders are apprehended in the quickest time possible.

Implementation Guidelines

12. After the enactment of the new legislation, we suggest for the following to be looked into at the implementation stage:

12.1 Public education targeting different audiences

a. General public:

- Explaining what CSAM is about and addressing its impacts on our society
- How to report suspected cases

b. Children:

- Staying safe in the online world (with strategies that are in line with their developmental stage)
- How to recognise grooming behaviour
- Strategies to cope with inappropriate behaviour by their peers or someone older

c. Parents and secondary caregivers, e.g. teachers:

- What constitutes grooming behaviour
- How to keep children and youth safe in the online world with age-appropriate strategies. For example, young children can be taught the do's and don'ts when interacting with unknown persons online, but such messaging will not be as effective on adolescents. Rather, efforts should instead focus on helping teenagers form respectful relationships.

- What to do if they suspect their child is victimised
- How to impart knowledge on healthy sexuality from young

12.2 Rehabilitation for offenders and potential offenders, as well as social support for their families

- a. Literature has shown that there are [poor outcomes for child sexual offenders](#) (Gan, 2017) though recidivism rates in the local context are not known. A case example is that of Jonathan Wong, a former Ministry of Education scholar. In 2010, he was caught and convicted for the possession of 50 videos containing CSAM while studying in the UK. Some of the videos contained graphic content and featured victims as young as six. After his return to Singapore, he was again caught and sentenced to five years jail in 2012 for sex with an underage girl (Yahoo Newsroom, 2012).

More research can be done on recidivism, in order to determine if there is a need for more specialised intervention to prevent re-offending. For example the Circles of Accountability and Support programme in Canada trains volunteers to support ex-offenders. These volunteers work closely with police and mental health professionals to raise the alarm if necessary (CoSA Canada, 2015).

- b. Most treatments focus on offenders who are already known to the system (e.g., convicted offenders serving prison sentences, perpetrators of intra-familial sexual abuse, as well as youth sexual offenders known to the MSF). There are no preventative services for sexual addictions other than those offered by private therapists (e.g., [Promises](#)). We should look into specialised treatment programmes for potential offenders. An example is the “Don’t Offend” programme in Germany (n.d.); where outpatient preventative therapy options are made available to those who feel sexually attracted to children and/or youth. Stop it Now! UK and Ireland (2018) also runs a helpline that adult abusers and those at risk of abusing can call to seek help to change.
- c. It is unclear whether adult sexual offenders receive sufficient aftercare support after they are released from prison. Such services for them, as well as their family members, are worth looking into.

12.3 Community-based services and support for child sexual abuse victims

There are not many specialised, community-based services for child sexual abuse victims. Initiatives such as Temasek Cares/ KKH's KITS programme (n.d.), which aims to train counsellors and social workers to conduct trauma-focused Cognitive Behavioural Therapy can perhaps be expanded in scope to equip professionals to also care for sexual abuse victims. Minors who may have been consensual in the sexual abuse acts (e.g. commercial sex) should also be included in these services to ensure they are supported and cared for.

Conclusion

13. The age of disruption will certainly bring on more challenges where the safeguarding of children is concerned. Technology has enabled sexual crimes against children to be committed more easily and more pervasively — we are already seeing the ill effects of it. Singapore Children's Society applauds the government's efforts to ensure that our laws effectively cover offences relating to CSAM, and we have put this paper together to support its initiatives. We will be glad to further offer our assistance and inputs if and when needed.

Annex 1: The COPINE Scale

COPINE stands for Combating Paedophile Information Networks in Europe and this project was established in 1997. The COPINE scale was originally developed for therapeutic psychological purposes— to distinguish between child erotica and child pornography. Later, in cooperation with the Paedophile Unit of the London Metropolitan Police, it developed a typology to categorise child abuse images. The scale consists of ten levels of severity and was based on analysis of images available on websites and internet newsgroups. The ten levels are:

Level – 1

Type – Indicative

Description – Non-erotic and non-sexualised pictures showing children in their underwear, swimming costumes from either commercial sources or family albums. Pictures of children playing in normal settings, in which the context or organisation of pictures by the collector indicates inappropriateness.

Level – 2

Type -Nudist

Description – Pictures of naked or semi-naked children in appropriate nudist settings, and from legitimate sources.

Level – 3

Type – Erotica

Description – Surreptitiously taken photographs of children in play areas or other safe environments showing either underwear or varying degrees of nakedness.

Level – 4

Type – Posing

Description – Deliberately posed pictures of children fully clothed, partially clothed or naked (where the amount, context and organisation suggest sexual interest).

Level – 5

Type – Erotic Posing

Description – Deliberately posed pictures of fully, partially clothed or naked children in sexualised or provocative poses.

Level – 6

Type – Explicit Erotic Posing

Description – Pictures emphasising genital areas, where the child is naked, partially clothed or fully clothed.

Level – 7

Type – Explicit Sexual Activity

Description – Pictures that depict touching, mutual and self-masturbation, oral sex and intercourse by a child, not involving an adult.

Level – 8

Type – Assault

Description – Pictures of children being subject to a sexual assault, involving digital touching, involving an adult.

Level – 9

Type – Gross Assault

Description – Grossly obscene pictures of sexual assault, involving penetrative sex, masturbation or oral sex, involving an adult.

Level – 10

Type – Sadistic/Bestiality

a. Pictures showing a child being tied, bound, beaten, whipped or otherwise subject to something that implies pain.

b. Pictures where an animal is involved in some form of sexual behaviour with a child.

Adapting this scale to offences charged in court, the [UK Sentencing Council](#) then developed three offence categories of indecent images of children (2013):

	Possession	Distribution	Production
Category A	Possession of images involving penetrative sexual activity Possession of images involving sexual activity with an animal or sadism	Sharing images involving penetrative sexual activity Sharing images involving sexual activity with an animal or sadism	Creating images involving penetrative sexual activity Creating images involving sexual activity with an animal or sadism
Category B	Possession of images involving non-penetrative sexual activity	Sharing of images involving non-penetrative sexual activity	Creating images involving non-penetrative sexual activity
Category C	Possession of other indecent images not falling within categories A or B	Sharing of other indecent images not falling within categories A or B	Creating other indecent images not falling within categories A or B

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