



# MULTISECTORAL RESPONSE AND CAPACITY ASSESSMENT (MRC)

## France

Joint and coordinated action for the prevention, investigation, and assistance to victims of Online Child Sexual Exploitation and Abuse.

November 2025

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ASSESSMENT (MRC)  
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Children (ICMEC)

National Capacity Building Program

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## ACRONYMS

**AEMO** - Educational action in an open environment (Action éducative en milieu ouvert)

**AFP** - Agence France-Presse

**AI** - Artificial Intelligence

**AIG-CSAM** – Artificial Intelligence Generated Child Sexual Abuse Material

**AJ** – Legal Aid (Aide juridictionnelle)

**ANCT** - National Agency for Territorial Cohesion (Agence nationale de la cohésion des territoires)

**API** - Application Programming Interface

**Arcep** - Regulatory Authority for Electronic Communications, Postal Services, and Press Distribution (Autorité de régulation des communications électroniques, des postes et de la distribution de la presse)

**Arcom** – Regulatory Authority for Audiovisual and Digital Communication (Autorité de régulation de la communication audiovisuelle et numérique)

**ASE** - Child Welfare Services (Aide sociale à l'enfance)

**BAVPA** – Office for Victim Support and Association Policy (Bureau de l'aide aux victimes et de la politique associative)

**CASF** - Social Action and Families Code (Code de l'action sociale et des familles)

**CEF** – Closed Educational Centers (Centres éducatifs fermés)

**CER** – Reinforced Educational Centers (Centres éducatifs renforcés)

**CERT-GN** – Computer Emergency Response Teams for the Gendarmerie Nationale

**CGE** - General Council for the Economy (Conseil général de l'économie)

**CIASE** - Independent Commission on Sexual Abuse in the Church (Commission indépendante sur les abus sexuels dans l'Église)

**CIDE** – International Convention on the Rights of the Child (Convention Internationale des Droits de l'Enfant)

**CIIVISE** - Independent Commission on Incest and Sexual Violence Against Children (Commission indépendante sur l'inceste et les violences sexuelles faites aux enfants)

**CIVI** – Compensation Commission for Victims of Crime (Commission d'indemnisation des victimes d'infractions)

**CJEU** - Court of Justice of the European Union

**CJPM** – Juvenile Criminal Justice Code (Code de la justice pénale des mineurs)

**CLAV** – Local committees providing assistance to minors who are victims of crime (Comités locaux d'aide aux victimes dédiés aux mineurs)

**CMJ** - Municipal youth councils (Conseils municipaux de jeunes)

**CMP** - Medical and psychological centers (Centres médico-psychologiques)

**CMPEA** – Medical and psychological centers for children and adolescents (Centres Médico-Psychologiques pour Enfants et Adolescents)

**CNAIP** - National Unit for the Analysis of Child Pornography Images (Centre National d'Analyse des Images Pédo pornographiques)

**CNIL** - National Commission for Information Technology and Civil Liberties (Commission nationale de l'information et des libertés)

**CPS** - Child Protection System (Système de protection de l'enfance)

**CRIAVS** - Resource Centers for Professionals Working with Sex Offenders

## ACRONYMS

(Centres de Ressources pour les Intervenants auprès des Auteurs de Violences Sexuelles)

**CRIP** - Unit for the Collection, Processing, and Evaluation of Information of Concern (Cellule de recueil des informations préoccupantes)

**CSAM** - Child Sexual Abuse Material (Matériel d'Abus Sexuel Infantile)

**CSEA** - Child sexual exploitation and abuse (Exploitation et Abus Sexuels Infantiles)

**CSN** – Coordinators for Digital Services (Coordinateurs pour les services numériques)

**CSR** - Corporate Social Responsibility (Responsabilité Sociale d'Entreprise)

**CVL** – High School Student Council (Conseil de Vie Lycéenne)

**CVM** – Association Against Violence Against Minors (Association Contre les Violences sur Mineurs)

**DACG** - Directorate of Criminal Affairs and Pardons of the Ministry of Justice (Direction des affaires criminelles et des grâces du Ministère de la Justice)

**DARC** – Division of Intelligence Coordination (Division de l'animation renseignement coordination)

**DAP** - Department of Crimes Against Persons (Département d'Atteintes aux Personnes)

**DCPJ** - Central Directorate of the Judicial Police (Direction centrale de la police judiciaire)

**DIAV** – Interministerial Delegation for Victim Support (Délégation Interministérielle à l'Aide aux Victimes)

**DILCRAH** - Interministerial Delegation for the Fight Against Racism, Anti-Semitism, and Anti-LGBT Hatred (Délégation interministérielle à la lutte contre le racisme, l'antisémitisme et la haine anti-LGBT)

**DNPJ** - National Directorate of the Judicial Police (Direction nationale de la police judiciaire)

**DO** - Operations Division (Division des opérations)

**DPJJ** - Directorate for the Judicial Protection of Young People (Direction de la Protection Judiciaire de la Jeunesse)

**DROM** - Overseas Departments and Regions (Départements et régions d'outre-mer)

**DSA** - Digital Services Act

**DT** - Technical Division (Division technique)

**ECHR** - European Court of Human Rights

**EMPACT** - European Multidisciplinary Platform Against Criminal Threats

**ENM** - National School for the Judiciary (École nationale de la magistrature)

**EPM** - Juvenile Detention Centers (Établissements pénitentiaires pour mineurs)

**ESP** - Undercover Investigators (Enquêteurs sous pseudonym)

**EU** - European Union

**EVARS** - Education on Emotional and Relationship Skills and Sexuality (Education à la vie affective et relationnelle, et à la sexualité)

**FBI** - Federal Bureau of Investigations (U.S.A.)

**FFCRIAVS** - French Federation of Resource Centers for Professionals Working with Sex Offenders (Fédération Française des Centres de

## ACRONYMS

Ressources pour les Intervenants auprès des Auteurs de Violences Sexuelles)

**FGTI** - Guarantee Fund for Victims of Terrorism and Other Offenses (Fonds de garantie des victimes des actes de terrorisme et d'autres infractions)

**FIJAIS-V** - Judicial File of Perpetrators of Sexual or Violent Offenses (Fichier Judiciaire des Auteurs d'Infractions Sexuelles ou Violentes)

**FSH** - Hosting Service Providers (Fournisseurs de services d'hébergement)

**GDPR** - General Data Protection Regulation

**HSP** - Hosting service providers

**IASE** - Images of Child Sexual Abuse (Images d'abus sexuel d'enfants)

**ICACCOPS** - Internet Crimes Against Children Child Online Protection System

**ICMEC** - International Centre for Missing & Exploited Children

**ICSE** - International Child Sexual Exploitation database

**IGERS** - General Inspectorate of Education, Sport and Research (Inspection Générale de l'Éducation, du Sport et de la Recherche)

**IP** - Information of Concern (Informations Préoccupantes)

**ISP** - Internet Service Providers

**ITT** - Total incapacity for work (Incapacité totale de travail)

**JAF** - Family court judges (Juges aux affaires familiales)

**LCEN** - Law No. 2004-575 of June 21, 2004 on confidence in the digital economy (Loi n°2004-575 du 21 juin 2004 pour la confiance dans l'économie numérique)

**LEOR** - Law Enforcement Online Request

**LEERS** - Law Enforcement Request System

**LERT** - Law Enforcement Request Tracker

**MAICS** – Juvenile Sexual Offenders (Mineurs auteurs d'infractions à caractère sexuel)

**MIVILUD** - Mission for Vigilance and Combating Sectarian Aberrations (Mission de vigilance et de lutte contre les dérives sectaires)

**MRN** - National Response Model (Modèle de Réponse Nationale)

**MRC** - Multisectoral Response and Capacity Assessment

**NCECC** - National Child Exploitation Crime Centre in Canada

**NCMEC** - National Center for Missing and Exploited Children (U.S.A.)

**NGO** - Non-Governmental Organizations

**NICHHD** - National Institute of Child Health and Human Development

**OAS** - Organization of American States

**OCSEA** - Online child sexual exploitation and abuse

**OFAC** – French Office for Combating Cybercrime (Office Anti-Cybercriminalité)

**OFMIN** - Office for Minors (Office Mineurs)

**OCLCTIC** - Central Office for Combating Crime Related to Information and Communication Technologies (Office central de lutte contre la criminalité liée aux technologies de l'information et de la communication)

**ONPE** - National Observatory for Child Protection (Observatoire national de la protection de l'enfance)

**OPEN** - Observatory for Parenting and Digital Education (Observatoire Parentalité et Éducation Numérique)

## ACRONYMS

**OPJ** - Judicial Police Officers (Officiers de Police Judiciaire)

**OPP** - Provisional Placement Order (Ordonnance de Placement Provisoire)

**PARE** - Program Against the Sexual Exploitation of Minors (projet pour Piloter et animer un Réseau d'acteurs contre la prostitution des mineurs)

**PHARE** - Plan to Combat Bullying in Schools (Plan de lutte contre le harcèlement à l'école)

**PHAROS** - Platform for Harmonization, Analysis, Cross-Checking, and Referral of Reports (Plateforme d'harmonisation, d'analyse, de recoupement et d'orientation des signalements)

**PJJ** - Judicial Protection of Youth (Protection Judiciaire de la Jeunesse)

**PMI** - Maternal and Child Protection (Protection maternelle et infantile)

**PNAV** - Victim Support Platform (Plateforme d'accompagnement des victimes)

**PPL** - Proposed Law (Proposition de loi)

**SADJAV** - Service for Access to Law and Justice and Victim Support (Service de l'accès au droit et à la justice et de l'aide aux victimes)

**SNCF** - French National Railway Company (Société Nationale des Chemins de Fer)

**SDLC** - Sub-Directorate for the Fight against Cybercrime (Sous-direction de la lutte contre la cybercriminalité)

**SICOP** - National Police Information and Communication Service (Service d'information et de communication de la police nationale)

**SIG** - Government Information Service (Service d'information du Gouvernement)

**SNJ** - National Union of Journalists (Syndicat national des journalistes)

**SPIP** - Prison Integration and Probation Service (Service pénitentiaire d'insertion et de probation)

**SREN** - Law aimed at securing and regulating the digital space (Loi visant à sécuriser et à réguler l'espace numérique)

**SSPO** - Operational Psychological Support Service (Service de soutien psychologique opérationnel)

**STIC** - Science, Technology, Information and Communication

**STOP** - Telephone Guidance and Prevention Service (Service Téléphonique d'Orientation et de Prévention)

**TAAF** - Austral and Antarctic French Lands (Terres Australes et Antarctiques Françaises)

**UAPED** - Pediatric Reception Units for Children at Risk (Unités d'Accueil Pédiatriques Enfants En Danger)

**UMIC** - National Union of Influencers and Content Creators (Union des métiers de l'influence et des créateurs de contenus)

**UN** - United Nations

**UNC-RCC** - National Cyber Unit of the Gendarmerie (Unité Nationale Cyber de la Gendarmerie)

**URC** - Criminal Intelligence Unit (Unité de renseignement criminel)

**VLOPSE** - Very large online platforms and search engines

## ABOUT ICMEC



**International Centre**™  
**FOR MISSING & EXPLOITED CHILDREN**

The International Centre for Missing and Exploited Children (ICMEC) is a non-governmental organization that fights against child sexual exploitation and abuse (CSEA) and searches for missing children. It is headquartered in Alexandria, Virginia, USA, with representation in Australia, Brazil, Colombia, El Salvador, France, Guatemala, Honduras, India, Indonesia, Romania, Singapore, Switzerland and The Philippines. Since its formation, it has worked hand-in-hand with governments, law enforcement, industry, and civil society organizations to build institutional, legislative, and public policy frameworks to protect children against disappearance, abuse, and sexual exploitation.

The work carried out by ICMEC in more than 120 countries has promoted, among other actions, the formation of local alliances for the implementation of policies for the eradication of sexual exploitation and the production of Child Sexual Abuse Material (CSAM).

These activities have been accompanied by entities such as the United Nations (UN), INTERPOL, the Organization of American States (OAS), and other multilateral organizations.

## ABOUT THE MRC ASSESSMENT



The global problem of Child Sexual Exploitation and Abuse (CSEA) represents a challenge for many countries that have institutional weaknesses to prevent, investigate, and care for child victims of these scourges. For this reason, in 2020, the ICMEC National Capacity Building program created the Multisectoral Response and Capacity Assessment (MRC), using the capacities of the WeProtect Model National Response (MNR) as a basis to identify the progress made, the gaps that still exist, and the corresponding recommendations to address them.

This model is multisectoral in nature since the strategic response to combat Online Child Sexual Exploitation and Abuse (OCSEA) must include comprehensive and complementary care from all the institutions involved in protecting and guaranteeing the rights of the children.

# INTRODUCTION



France, the world's fifth largest economy, has a population of around 68 million, which is relatively young but aging, with nearly 18% over the age of 65. It is also one of the most advanced European countries in the digital field, with nearly 59 per 100 persons for fixed-line and over 110 per 100 for mobile-cellular subscriptions (2021), growing momentum in artificial

intelligence and cybersecurity, and proactive regulation in the areas of protection of minors and personal data. France is organized into 101 departments, which are administrative subdivisions of the country located both in mainland France and overseas.

The French Republic has 12 overseas territories whose status is governed by Article 72-3 of the Constitution: Guadeloupe, French Guiana, Martinique, Réunion, Mayotte, Saint Barthélemy, Saint Martin, Saint Pierre and Miquelon, Wallis and Futuna, French Polynesia, New Caledonia, and the French Southern and Antarctic Lands (TAAF).

Five of these are overseas departments and regions (DROM – Départements et régions d'outre-mer) and unique communities governed by Article 73 of the Constitution: Guadeloupe, French Guiana, Martinique, Réunion, and Mayotte. The powers and applicable laws are identical or similar to those in force in mainland France. Five communities are "overseas communities" governed by Article 74 of the Constitution: Saint Barthélemy, Saint Martin, Saint Pierre and Miquelon, French Polynesia, and Wallis and Futuna. New Caledonia is governed by a dedicated title, Title XIII of the Constitution. Finally, Article 72-3 of the Constitution specifies that "the law shall determine the legislative regime and the specific organization of the French Southern and Antarctic Lands and Clipperton." The TAAF are placed under the authority of a representative of the State who holds the title of Senior Administrator of the TAAF. They comprise: Saint Paul Island, Amsterdam Island, the Crozet Archipelago, the Kerguelen Archipelago, Adélie Land, and the Bassas da India, Europa, Glorieuses, Juan da Nova,

# INTRODUCTION

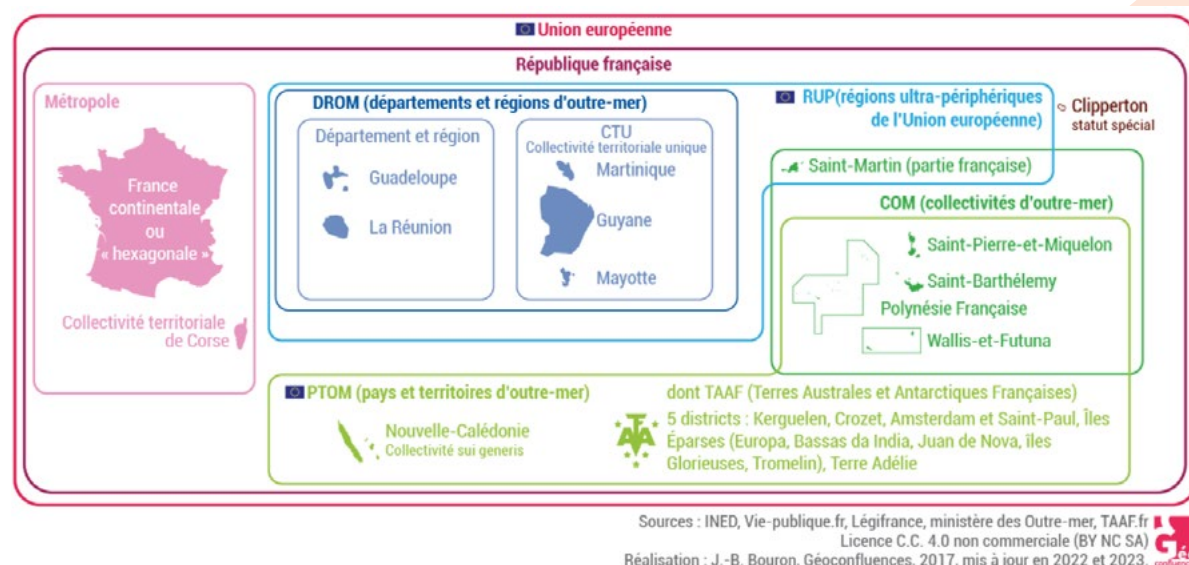
and Tromelin Islands. These territories have no permanent inhabitants<sup>1</sup>.

Between the months of May and October, 2025, ICMEC carried out the MRC Assessment for the Prevention, Investigation, and Care of Cases of Online Child Sexual Exploitation and Abuse (OCSEA) in France in order to identify the weaknesses and strengths of the state in addressing and mitigating this scourge.

For this purpose, the ICMEC National Capacity Building team worked hand-in-hand with the French government in the development of the final report.

This analytical methodology provides orientation and support to countries and organizations to comply with the commitment to prevent and mitigate CSEA in a framework in which (1) it is recognized that this cannot be addressed in isolation and (2) a broader set of capacities to prevent and address child sexual exploitation and abuse is required to ensure a comprehensive national response. For this, the model proposes the following 20 capacities to be developed according to six relevant sectors:

Additionally, the MRC methodology included the development of specific tools to identify the entities from which the necessary information was required to achieve the established objectives.



1. Sénat français, "Les territoires d'outre-mer", extracted from the website on 7 October 2025, <https://www.senat.fr/connaître-le-senat/role-et-fonctionnement/les-collectivites-doutre-mer.html>

# Preventing and tackling child sexual exploitation and abuse

## A Model National Response



### CAPABILITIES

### OUTCOMES

#### POLICY, LEGISLATION AND GOVERNANCE

##### 1 Leadership

Accountable, cross-sector national body with a clear mandate and resources to protect children from sexual exploitation and abuse online, and willingness to engage in international collaboration

##### 2 Legislation

Comprehensive and effective legal framework to prosecute offenders and protect children from all forms of sexual exploitation and abuse in line with international human rights standards  
 Legal provision to protect children engaged in consensual sharing of sexual content from criminalisation where appropriate.



##### Highest level national commitment to child sexual abuse prevention and response

Comprehensive understanding of child sexual abuse within the highest levels of government and law enforcement. Willingness to work with, and coordinate the efforts of, multiple stakeholders to ensure the enhanced protection of victims and an enhanced response to child sexual abuse offending.



#### CRIMINAL JUSTICE

##### 3 Dedicated law enforcement

Human and technical capabilities to investigate child sexual abuse online and offline, including cross-border cases  
 Trauma-informed training for law enforcement  
 Coordination with victim support services

##### 4 Judiciary and prosecutors

Specialist training on child sexual exploitation and abuse and technology-enabled offending  
 Child-friendly and victim-centred protocols

##### 5 Offender management process

Multi-agency system to identify, manage and rehabilitate sex-offenders, and statutory tools (rehabilitation and education programmes, community supervision)

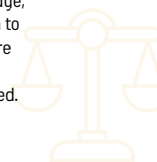
##### 6 Access to image database

National database with access to the Interpol's ICSE database for international collaboration, supported by alignment with terminology for CSAM categorisation



##### Effective and successful child sexual abuse investigations, convictions and offender management

Law Enforcement and judiciary have the knowledge, skills, systems and tools required to enable them to perform victim-focused investigations and secure positive judicial outcomes. Child sexual abuse offenders are managed and reoffending prevented.



#### VICTIM SUPPORT AND EMPOWERMENT

##### 7 End-to-end support

Planned, integrated and multi-stakeholder support for victims and survivors  
 Services are inclusive and sensitive to age, gender, sexuality, disability and ethnicity.  
 Psychological support across dedicated law enforcement, frontline workers accessing image databases, child protection workforce, and hotlines

##### 8 Child protection workforce

Skilled, specialist statutory workforce trained, coordinated and available to provide trauma-informed support to protect and support children at risk of sexual abuse and exploitation online  
 Guidelines for frontline professionals on emerging and complex issues such as child "self-generated" sexual material

##### 9 Compensation, remedies and complaints arrangements

Provision of measures to allow children and victims accessible support in compensation, legal remedies and complaints procedures

##### 10 Child helpline

Accessible to all children, nationwide, toll-free, available 24/7, voice and text based, offering confidential support and counselling with appropriate referral mechanisms.  
 Robust data protection systems  
 Counsellors with specific training in online harms



##### Appropriate support services for children and young people

Children and young people have access to services that support them through the investigation and prosecution of crimes against them. They have access to shelter; specialised medical and psychological services; and rehabilitation, repatriation and resocialisation services.



**SOCIETY AND CULTURE**

**11 Child sexual exploitation and abuse hotline**

Dedicated portals/hotlines for the public to report suspected child sexual exploitation and abuse online  
Cooperation with law enforcement and the technology industry

**12 Education programmes**

National education programme (including age- appropriate, accessible and inclusive content) to raise awareness of all forms of child sexual exploitation and abuse – empowering children, young people, parents, guardians, caregivers and practitioners with relevant information  
Systematic training for professional in education, social care and health

**13 Child participation**

Children and young people encouraged and enabled to give ideas and influence policy and practice relating to child sexual exploitation and abuse  
Child protection, children's rights frameworks, and trauma-informed practice utilised when engaging children

**14 Offender prevention and support systems**

Support to prevent people with a sexual interest in children from abusing or accessing child sexual abuse material  
Support for convicted offenders as part of rehabilitation response  
Specialised support for children displaying harmful sexual behaviour

**15 Informed and ethical media reporting**

Evidence-based and sensitive reporting that respects victims' and survivors' rights and dignity



**Child sexual abuse prevented**

Children and young people are informed and empowered to protect themselves from child sexual abuse. Parents, carers, teachers and childcare professionals are better prepared to keep children safe from child sexual abuse, including addressing taboos surrounding sexual abuse.



**INDUSTRY**

**16 Takedown procedures and reporting**

Local removal and blocking of child sexual abuse material online  
Procedures for timely removal of child sexual abuse material when a company confirms its presence  
Statutory protections for industry to report child sexual abuse, including content transmission to law enforcement or a designated agency  
Global and cross-sector collaboration

**17 Innovative solution development**

Technological solutions to prevent and address child sexual exploitation and abuse online

**18 Responsible business conduct**

Child protection and safeguarding policies, due diligence and remediation that address child sexual exploitation and abuse online



**Industry engaged in developing solutions to prevent and tackle child sexual abuse**

The public can proactively report child sexual abuse offences. Industry has the power and willingness to block and remove child sexual abuse material online and proactively address local child sexual abuse issues.



**RESEARCH AND DATA**

**19 Research and data**

Data, research and analysis on the threat of and response to child sexual exploitation and abuse online  
Robust administrative data systems (e.g. police, courts, social services) to monitor service delivery, access and effectiveness and provide regular insights for decision-makers

**20 Universally agreed terminology**

Information and policies communicated clearly and in alignment with international standards



**Awareness raised among the public, professionals and policy makers**

Potential future offenders are deterred. Child sexual abuse offending and reoffending is reduced.



**ENABLERS**

Cross sector, multidisciplinary collaboration

Willingness to prosecute, functioning justice system and rule of law

Supportive reporting environment

Aware and supportive public and professionals, working with and for children

Sufficient financial and human resources

National legal and policy frameworks in accordance with the UNCRC and other international and regional standards

Data and evidence on child sexual abuse

## GOALS

### General

Develop a reference framework for the construction of a strategic plan that allows ICMEC, the French government, and other relevant actors to carry out the consolidation of a Model National Response (MNR) and guide a work plan based on the gaps found to combat OCSEA. Understand where current efforts of French actors can be supported and enhanced.

### Specific

- Identify the gaps in the national response for the prevention, investigation, and assistance to victims of OCSEA in France.
- Identify priority actions aimed at filling the identified gaps.
- Provide inputs for the development of an intersectoral work plan for the construction of a national response to combat OCSEA, based on the MNR.

## METHODOLOGY

The methodology to carry out the MRC Assessment included the mapping of entities related to the protection of children against CSEA; as well as a series of instruments to collect information on the 20 capacities established in the MRC Assessment.

Surveys to identify and evaluate the capacities of the entities according to their responsibilities. These were carried out virtually with officials of each institution.

- Specific requests for information to entities through video calls and emails.
- Search for information in open data sources.

Subsequently, the information collected was complemented with the resources available in open sources and analysed based on the MNR according to four criteria:

1. Existence of a capacity in the country
2. Level of capacity development based on the information collected (Poor, Acceptable or Outstanding)
3. Identification of the gap between what is proposed in the MNR and the level of capacity development in the country
4. Potential actions that could contribute to reducing the gaps detected based on what is proposed in the MNR.

# PARTICIPATING INSTITUTIONS:

## Sector 1 - Policy, Legislation and Governance

- Point de Contact Association
- National Cyber Unit of the Gendarmerie (UNC-RCC – Unité Nationale Cyber de la Gendarmerie)

## Sector 2 - Criminal Justice:

- Office for Minors (OFMIN – Office Mineurs)
- National Cyber Unit of the Gendarmerie (UNC-RCC – Unité Nationale Cyber de la Gendarmerie)
- French Federation of Resource Centers for Professionals Working with Sex Offenders (FFCRIAVS – Fédération Française des Centres de Ressources pour les Intervenants auprès des Auteurs de Violences Sexuelles)

## Sector 3 - Victim Support and Empowerment:

- e-Enfance Association
- Interministerial Delegation for Victim Support (DIAV – Délégation Interministérielle à l'Aide aux Victimes)
- Point de Contact Association

## Sector 4 - Society and Culture:

- Point de Contact Association
- French Federation of Resource Centers for Professionals Working with Sex Offenders (FFCRIAVS – Fédération Française des Centres de Ressources pour les Intervenants auprès des Auteurs de Violences Sexuelles)
- e-Enfance Association
- Direction Interministérielle de l'Aide aux Victimes du Ministère de la Justice

## Sector 5 - Industry:

- Orange France
- Point de Contact Association
- META France

## Sector 6 - Research and Data:

- Point de Contact Association
- French Federation of Resource Centers for Professionals Working with Sex Offenders (FFCRIAVS – Fédération Française des Centres de Ressources pour les Intervenants auprès des Auteurs de Violences Sexuelles)
- META France

## RESULTS

For each capacity proposed by the MNR, the relevant aspects related to significant advances that contribute to the achievement of each of the capacities are presented, as well as the gaps evidenced and for which the MRC assessment later proposes recommendations.





## SECTOR 1: Policy, Legislation and Governance

- Highest level national commitment to child sexual abuse prevention and response
- Comprehensive understanding of child sexual abuse within the highest levels of government and law enforcement
- Willingness to work with, and coordinate the efforts of, multiple stakeholders to ensure the enhanced protection of victims and an enhanced response to child sexual abuse offending

### CAPACITY 1: Leadership

*Accountable, cross-sector national body with a clear mandate and resources to protect children from sexual exploitation and abuse online, and willingness to engage in international collaboration*

#### Findings:

In France, the development of public policy and coordination of national actions focused on protecting children online is divided between several ministries and is not centralized. There is no agency specifically responsible for protecting children online. Among the institutions in charge, two main ones act jointly:

- ▶ **Ministry of Labor, Health, Solidarity, and Families**
  - The High Commissioner for Children within the Ministry was created by decree in February 2025. This body is responsible for coordinating government action on child policy and consulting with stakeholders. The High Commissioner does not have a ministerial portfolio, and therefore no associated budget, as has often been the

case for ministers specifically linked to children's issues.

- ▶ **Ministry of Economy, Finance, Industrial and Digital Sovereignty**
  - Minister Delegate for Artificial Intelligence and Digital Technology
- ▶ **Social Assistance for Children at the departmental level**

France is divided into 101 departments, each of which has a budget, half of which is on average dedicated to social action, including child protection. As such, they are responsible for child welfare (ASE), maternal and child protection (PMI), adoption, and support for families in financial difficulty.

**Child welfare services (ASE)** are provided by the departmental councils. The ASE is responsible for providing material, educational, and psychological support to families at home, preventing risky situations, and monitoring the people to whom it has entrusted minors. It can therefore put in place several measures such as financial assistance, the intervention of an educator in the family home, administrative placement, or even emergency care for minors in danger.

The ASE regularly carries out preventive actions. These **include collecting and transmitting Information of Concern (IP)**<sup>1</sup>. This information includes any elements that give cause for concern that a minor is in danger in their home and needs help. The ASE is required to report any situation involving a minor that gives cause for concern to the public prosecutor. It is on the basis of this report that the magistrate or juvenile court judge will decide on the appropriate care arrangements; this is known as judicial placement.

With regard to the status of victims, the French government created an independent authority in 2021:

1. <https://www.aide-sociale.fr/ase-aide/>

► **The Independent Commission on Incest and Sexual Abuse of Children (CIIVISE) assesses the extent of sexual abuse suffered by children and make public policy recommendations. It collects testimonies from victims and their families, analyzes prevention, reporting, and care mechanisms, and proposes measures to strengthen the protection of minors and improve support for victims.**

In addition, two independent authorities are central to the regulation of the French digital space, particularly with regard to the regulation of internet service providers (ISPs):

The Regulatory Authority for Audiovisual and Digital Communication (Arcom): created in 2022, Arcom is an independent public authority. It regulates audiovisual media, advertising, and online platforms, protects minors, combats illegal content (hate speech, misinformation, pornography, piracy), and guarantees media pluralism and diversity.

The 2024 law aimed at securing and regulating the digital space (SREN) transposes the European Digital Services Act (DSA) into national law and formalizes the designation of Arcom as the authority responsible for coordinating the regulation of French online platforms, alongside the National Commission for Information Technology and Civil Liberties (CNIL).

ARCOM is composed of nine members and prepares its deliberations within the framework of eight thematic working groups. Among the working groups in place are:

- Protection of audiences and diversity in French society, responsible for monitoring content removals.
  - The group examines issues relating to the protection of audiences in the audiovisual media and in online platforms, particularly in the context of the Digital Services Regulation. It pays particular attention to the **protection of minors**, respect for women's rights, the fight against discrimination, the representation of French society, and issues of diversity, accessibility, and representation of disability.

In the context of regulating ISPs and hosting service providers (HSPs), Arcom's responsibilities are set out in the SREN law<sup>2</sup>. It can identify possible breaches of the DSA and ensure that stakeholders comply, either amicably or coercively.

Arcom therefore monitors compliance with the DSA and SREN laws governing FSHs, particularly with regard to **child sexual abuse** and terrorism, and more recently with regard to the dissemination of acts of torture, barbarism, and rape. This monitoring may result in the removal, blocking, or delisting of content by Arcom. However, Arcom does not regulate content available on social media and is not responsible for reporting it. This control is the responsibility of the platforms hosting the content, which are required to moderate it and set up reporting tools. Arcom ensures that these digital players apply the relevant rules.

► **Also responsible for regulating French operators, the French Regulatory Authority for Electronic Communications, Postal Services and Press Distribution (Arcep), is an independent administrative authority. Arcep is responsible for regulating digital infrastructure, the postal sector, and press distribution. Several regulators are working together to pool their resources, including Arcep, CNIL, and Arcom.**

Arcep and Arcom, for example, are developing new collaborations within a **digital hub** shared by both institutions. Created in March 2020, this digital hub includes, for example, work on protecting minors from online pornographic content. A monthly monitoring committee on "Protecting minors from online pornography" includes all signatories to the protocol of commitments for preventing minors' exposure to pornographic content.

► **The National Commission for Information Technology and Civil Liberties (CNIL): created in 1978, the CNIL is an independent administrative authority responsible for ensuring the protection of personal data and respect for privacy. It monitors the use of data by public and private entities, assists citizens in their efforts, and ensures compliance with the European Union's General Data Protection**

2. Note the distinction between ISPs (Internet Service Providers), which provide the network infrastructure in France, and hosting service providers (HSPs), companies that set up physical servers and databases using an ISP.

**Regulation (GDPR).** It pays particular attention to the protection of children and young people in the digital space.

This also means that **all complaints and requests relating to personal data** (access, rectification, deletion, etc.) go through the CNIL, including in investigations involving minors. When an investigation involves the collection or processing of personal data (e.g., a database created for a criminal investigation), it must be declared and framed in accordance with the GDPR. The authorities (or authorized investigators) can therefore send direct requests to entities. These entities apply a specific legal framework that defines what they can and cannot disclose. The data codification is published and available for consultation. For minors, the procedures are already well defined thanks to robust systems such as that of the National Center for Missing and Exploited Children (NCMEC) in the United States, which provides a global reference framework.

The CNIL leads the **Educnum** collective, which brings together more than 60 non-profit organizations that carry out grassroots actions to reach out to the public, focused on the general interest and without commercial aims, and call on public authorities to act in favor of a more inclusive digital world and to teach digital education from an early age.<sup>3</sup>

## CAPACITY 2: Legislation

*Comprehensive and effective legal framework to prosecute offenders and protect children from all forms of sexual exploitation and abuse in line with international human rights standards.*

*Legal provision to protect children engaged in consensual sharing of sexual content from criminalization where appropriate.*

### Findings:

Note: *In France, the term “child pornography” is used in legislation. This section uses it for consistency with current legislation. However, ICMEC encourages the use of terms in accordance with the recommendations*

*of the Terminology Guidelines for the Protection of Children from Sexual Exploitation and Abuse (“Luxembourg Guidelines”). French legislation uses the term “pédopornographie” (child pornography), since ‘pédocriminalité’ (pedocriminality) implies a criminal record that does not reflect the language of crime or offense. The term “pornographie mettant en scène des mineurs” (pornography involving minors) is also used, although the English term “CSAM” is used informally.*

In France, Child Sexual Abuse Material (CSAM) refers to any visual content depicting a minor engaged in explicit sexual activity, whether real or simulated. Its production, distribution, possession, or viewing constitutes a serious offense under French, European, and international law.

Several provisions have been adopted by France under international law (I), European law (II) and national law (III).

### 1. International law

► **International Convention on the Rights of the Child (CRC) (1989, ratified by France in 1990)** Articles 19, 34, and 36 of the Convention affirm the right of every child to be protected from all forms of violence, abuse, or sexual exploitation. It requires States Parties to take legislative, administrative, and educational measures to prevent the sexual exploitation of minors, including in digital environments. It provides a universal legal basis for all national and international actions to combat child sexual exploitation content.

► **Palermo Convention and Additional Protocol (2000, ratified by France in 2002)** The Palermo Convention concerns the fight against transnational organized crime, including trafficking in children for sexual exploitation. The Additional Protocol requires States to criminalize the exploitation of children for the purpose of producing or disseminating sexually explicit content.

3. [https://www.cnil.fr/sites/default/files/2024-06/depliant\\_collectif\\_educnum.pdf](https://www.cnil.fr/sites/default/files/2024-06/depliant_collectif_educnum.pdf)

- ▶ **Optional Protocol to the CRC (2000, ratified in 2003).** The protocol relates to the sale of children, the sexual exploitation of minors for prostitution, and the production of CSAM. It requires States to punish the production, possession, distribution, and dissemination of content that sexually exploits minors.
- ▶ **Budapest Convention (Council of Europe) (2001, ratified in 2006).** The Convention facilitates international cooperation in combating cybercrime, including crimes related to the dissemination of CSAM.
- ▶ **Lanzarote Convention (Council of Europe) (2007, ratified in 2010).** The Convention provides for the criminalization of all sexual violence against children, with an emphasis on prevention, victim protection, and prosecution of perpetrators.

## 2. European law

As a member state of the European Union (EU), European legislation has a direct and structuring influence on French legislation. European regulations are immediately applicable in French law. European directives, on the other hand, must be transposed into national law, which leads France to adapt its laws to comply with the objectives set by the EU. Finally, the case law of the Court of Justice of the European Union (CJEU) and the European Court of Human Rights (ECHR) also influence the interpretation and development of French law, particularly with regard to the protection of fundamental rights.

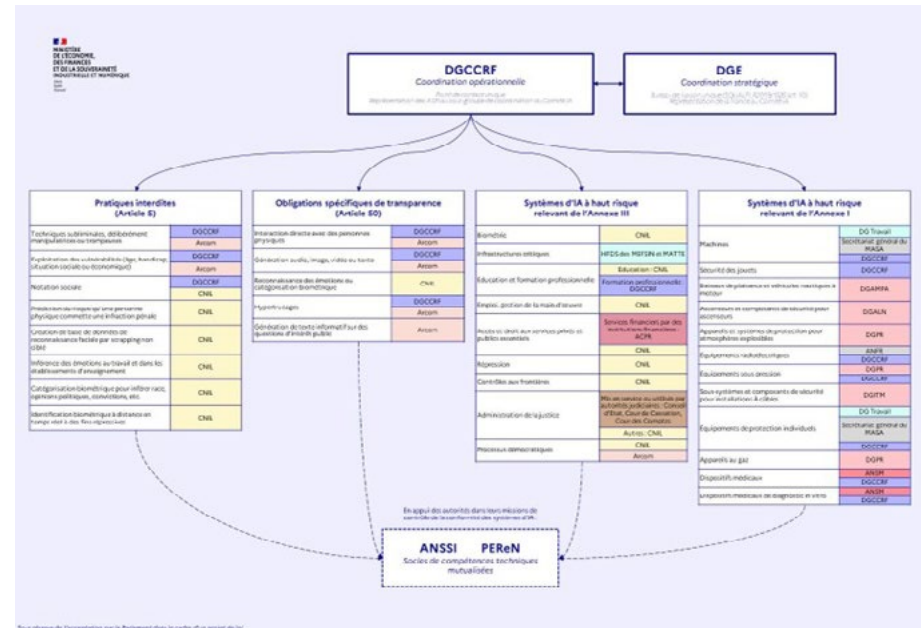
European legislation on child sexual exploitation and abuse (CSEA) is structured around several main areas:

### ▶ AI Act

The AI Act is the first European legal framework dedicated to artificial intelligence, adopted in 2024, and scheduled for gradual implementation starting in 2025 and still ongoing. It establishes a risk-based approach, ranging from banning systems that pose unacceptable risks (such

as behavioral manipulation or mass biometric surveillance) to strictly regulating high-risk systems (health, education, justice, security). Obligations include transparency, conformity assessment, data governance, and traceability. The aim is to promote innovation while ensuring security, fundamental rights, and public trust.

On September 9, 2025, the French government published its draft distribution of competent authorities to enforce the European regulation on artificial intelligence. An organization that favors existing sectoral expertise. Rather than creating a new “AI super-authority,” France is focusing on sectoral expertise: each company will primarily deal with its usual regulator.



► **The General Data Protection Regulation (GDPR) In effect as of May 25, 2018, the GDPR is the European legal framework governing the processing of personal data. It aims to strengthen the rights of individuals, harmonize rules within the EU, and hold public and private actors who collect or use such data accountable.**

Key principles:

- Clear consent and transparent information for individuals
- Strengthened rights: access, rectification, erasure (“right to be forgotten”), portability
- Accountability and security obligation
- Penalties of up to €20 million or 4% of global turnover

Each Member State has a national data protection authority (in France, the CNIL) responsible for monitoring and imposing penalties.

#### ► **Digital Services Act (DSA)**

Adopted on October 19, 2022 (EU Regulation 2022/2065), the DSA requires online platforms to limit the spread of illegal content and protect users, particularly minors.

Main obligations:

- Transparency on moderation, algorithms, and data collected
- Simple and effective reporting tools
- Prohibition of targeted advertising aimed at minors
- Public reports and making certain data available to researchers

The regulation creates a status of **trusted flaggers** (recognized associations or NGOs) whose reports of illegal content must be treated as a priority by platforms. It also guarantees internet users the right of appeal in the event of disputed moderation. Finally, each Member State must designate an **independent national authority as a Digital Services**

**Coordinator** (DSC) (in France, Arcom) responsible for supervising the application of the text, with powers of investigation, sanction, and cooperation.

Penalties for non-compliance:

- Fines of up to 6% of global turnover
- Penalty payments and corrective measures (imposed by Arcom or the European Commission)
- Temporary suspension of service in the event of serious and repeated breaches

#### ► **Directive 2011/93/EU – Combating sexual abuse of children**

Adopted on December 13, 2011, **Directive 2011/93/EU** aims to harmonize Member States’ legislation to combat **sexual abuse, sexual exploitation of children, and child sexual abuse material (CSAM)**. It defines a common set of criminal offenses and sets **minimum penalties** for perpetrators. The European directive harmonizes the criminalization of CSEA, including the production and distribution of CSAM, with common minimum penalties. It incorporates new offenses adapted to the digital world, such as online grooming and incitement to meet a minor, and strengthens prevention through education and training. Finally, it places victim protection at the center, guaranteeing specialized support and limiting revictimization during proceedings.

The directive was transposed by **French Law No. 2013-711 of August 5, 2013**, which strengthened the offenses in the **Criminal Code** (in particular, Article 227-23 relating to the possession, distribution, and production of CSAM). This transposition made it possible to broaden the scope of offenses (e.g., grooming, possession of CSAM, incitement to sexual acts), increase penalties, and improve international judicial cooperation.

### 3. National law

#### ► Law No. 2004-575 of June 21, 2004 on confidence in the digital economy (LCEN)

The LCEN establishes the responsibility of hosting providers and online service providers in the fight against illegal content, including CSAM. In practical terms, platforms must put in place mechanisms enabling users to report such content and are required to remove it as soon as they become aware of it. Failure to comply with this obligation may result in civil and criminal penalties. Article 226-15 of the LCEN also introduced penalties for violating the confidentiality of electronic communications, which includes certain practices related to the dissemination of illegal content.

Criminal penalties:

- **Failure to remove clearly illegal content:** when a host or service provider does not promptly remove reported illegal content, they may be prosecuted for complicity in the offense in question (Criminal Code).
- **Public communication of illegal content:** publishers and hosting providers who leave such content online may be sentenced to prison terms and/or fines as provided for in the Criminal Code, depending on the offense.

Financial and civil penalties:

- **Civil liability of hosting providers:** if they do not promptly remove reported manifestly illegal content, they are liable under civil law and may be ordered to pay damages.
- **Obligation to cooperate with judicial authorities:** in the event of refusal or failure to comply with their obligations, platforms and hosting providers may be subject to financial penalties.

Specific penalties provided for by the LCEN:

- **Absence of mandatory legal notices on a website:** fine of up to €75,000 for a natural person and €375,000 for a legal entity.
- **Provision of false or incomplete data to the authorities:** fine of €15,000 and up to one year's imprisonment.
- **Obstruction of data retention:** criminal penalties provided for by the Criminal Code (up to one year's imprisonment and a fine of €75,000).

#### ► Criminal Code

In general, Article 222-23 of the Criminal Code defines **rape** as: “any act of sexual penetration, of any nature whatsoever, committed against another person by **violence, coercion, threat, or surprise.**” It establishes a basic sentence of 15 years' imprisonment, an aggravated sentence of 20 years, and up to life imprisonment in the most serious cases (rape resulting involving torture and with acts of barbarism). Since the law of August 3, 2018, on sexual and sexist violence, the Criminal Code specifies that coercion may result from the age difference between the perpetrator and the victim, or from the authority that the perpetrator exercises over the victim.

In January 2025, a bill was introduced in the National Assembly to amend the legal definition of rape and sexual assault to explicitly include the concept of **non-consent**. The text introduces the notion that consent must be **free, informed, specific, prior, and revocable**, and that it cannot be inferred from the victim's silence or lack of reaction. On March 6, 2025, the Council of State issued a favorable opinion on this proposal, validating the idea of explicitly including lack of consent in the definition of rape and sexual assault. The law was adopted in October 2025.

With regard to OCSEA, sexual offenses committed against a minor are punishable by law **even in the absence of violence, coercion, threat, or surprise**. The following are also classified as sexual violence: mutilation, prostitution of minors, child pornography, and corruption of minors (exposure to sexual acts/images). Specific provisions relating to sexual abuse of minors and child pornography include: The key points of the French Criminal Code are therefore:

<b>CSAM</b>	Article 227-23	Criminalizes the recording, distribution, provision, transmission, storage, or mere possession of <b>child pornography</b> .	The penalties incurred are 5 years' imprisonment and a fine of €75,000.
	Article 227-23-1 (introduced by Law n°2021-478 of 21 April 2021)	Prohibits adults from soliciting minors to distribute or transmit pornographic images, videos, or representations of themselves ( <b>a practice often referred to as self-generated CSAM</b> ).	This offense is punishable by 7 years' imprisonment and a fine of €100,000.
	Article 227-24	Prohibits the production, transport, or distribution of violent or <b>pornographic messages</b> that may be seen by minors, whether transmitted electronically or by any other means.	The penalties provided for can be up to 5 years' imprisonment and a fine of €75,000.

<b>Sexual exploitation</b>	Article 227-25	Punishes <b>sexual assault on a minor</b> under the age of 15, even without violence, coercion, threats, or surprise.	Penalties range from 5 to 20 years' imprisonment, and are automatically increased in cases involving minors under the age of 15. In the most serious cases (rape resulting in death or committed with torture), the sentence can be up to life imprisonment.
	Articles 222-22 and following	Criminalizes <b>rape</b> , defined as any act of sexual penetration committed with violence, coercion, threats, or surprise.	
	Art. 225-5 and following	<b>Pimping and exploitation:</b> Pimping is defined as aiding, assisting, or profiting from the prostitution of others. When minors are involved, this is considered a major aggravating circumstance.	The penalties provided for are up to 20 years' imprisonment. In cases involving organized networks, violence or exploitation of particularly vulnerable minors, the penalty can be up to 30 years' imprisonment. These provisions aim to punish not only the direct perpetrators, but also organized criminal structures.

<b>Corruption and incitation</b>	Art. 227-22-1	Corruption of minors: the act of inciting or inducing a minor to witness acts or performances of a sexual nature (exposure to pornography, masturbation, etc.). This provision aims to protect minors even when they are not directly involved in sexual acts.	Punishable by 5 years' imprisonment and a fine of €75,000.
	Art. 227-25-1	Inducement to engage in sexual acts: the act of an adult inducing a minor to engage in acts of a sexual nature. This offense applies in particular to online solicitation (grooming).	Punishable by 7 years' imprisonment.
<b>Non-denunciation</b>	Art. 434-3	The Criminal Code imposes a legal obligation to report such acts. Anyone with knowledge of a crime or offense committed against a minor must report it to the competent authorities. This measure strengthens the protection of children by making those around them accountable.	Failure to comply with this obligation is punishable by 3 years' imprisonment and a fine of €45,000.

The key points of the French Criminal Code are therefore:

- Harsher penalties in cases where the victim is under 15 years of age, or if the perpetrator is in a position of authority;
- The consideration of digital technology as an aggravating circumstance.

On September 30, 2021, the ordinance of February 2, 1945, on juvenile delinquency was repealed and replaced by the **Juvenile Criminal Justice Code (CJPM)**. The reform introduces several important changes: the presumption of discernment for minors aged 13 and over, the reorganization of educational measures (simplification, flexible measures, integration modules, reparation, etc.), “educational probation” as a common law procedure allowing guilt to be judged first and punished later, and an acceleration of procedures to improve the care of minors and victims.

► **Law No. 2024-449 of May 21, 2024, known as the SREN Law (Securing and Regulating the Digital Space),**

The SREN Act transposes the DSA adopted by the EU in October 2022 into French law. This transposition aims to strengthen the regulation of digital platforms, protect users (particularly minors), and guarantee cybersecurity.

Main objectives:

- Strengthen the safety of online users
- Regulate large digital platforms
- Protect minors
- Strengthen cybersecurity

### Transposition of the DSA by the SREN law

The SREN law transposes the DSA into French law by introducing specific obligations for digital platforms operating in France, whether or not they are established in the EU. It designates Arcom as the CSN, responsible for implementing and supervising this regulation in France.

Among the main measures of the SREN law are:

- **Anti-scam filter:** a system to warn users of phishing attempts and other online scams.
- **Age verification:** pornographic websites must implement systems to verify the age of users, or face penalties.
- **Content moderation:** strengthening of platforms' obligations in terms of content moderation.
- **Penalties:** introduction of penalties for platforms that do not comply with their obligations.

### Points of divergence with the DSA

Although the SREN law largely transposes the DSA, it also introduces measures specific to the French context. For example, the law provides for criminal penalties for hosting providers that do not quickly remove CSAM reported by the authorities, which goes beyond the requirements of the DSA. In addition, certain provisions of the initial draft of the SREN law, such as the introduction of an offense of online contempt, were censored by the Constitutional Council in May 2024 on the grounds that they infringed on freedom of expression.

#### ► Decree No. 2015-125 of February 5, 2015

This decree establishes a mechanism for the administrative blocking of websites disseminating CSAM. The competent authorities may require Internet service providers to make these sites inaccessible within 24

hours. This mechanism allows for a rapid and effective response to limit the circulation of CSAM online, without going through lengthy legal proceedings.

#### ► Decree No. 2022-1567 of December 13, 2022

Enacted pursuant to the LCEN, this decree requires online platforms to retain content that **has been removed or made inaccessible** for a period of **six months**. This data may be used in **judicial or administrative investigations** to facilitate the identification of perpetrators and preserve evidence essential to prosecution.

## 4. Future legislation

#### ► [Coming soon] Draft CSAM Directive (52022PC0209) establishing rules to prevent and combat child sexual abuse

This proposed text was adopted by the European Parliament and negotiations with the Council of the EU on the final version began on June 23, 2025. The Council of the EU has yet to adopt the final text. Transposition by Member States will await the final directive. Its objectives include tougher penalties, the removal of statutes of limitations for certain crimes, support for victims, consideration of “deepfakes,” and harmonization within the EU. In particular:

- **Criminalization of synthetic content (AI-CSAM)**
- **Extension to other offenses:** Harmonization of definitions of grooming, sextortion, live abuse, and age of consent rules across Europe.
- **Removal of statutes of limitations:** Certain forms of serious abuse, including AI-CSAM, will be prosecutable without time limits.

- **Prohibition of “pedophile manuals”:** Blocking and criminalization of documents providing advice or strategies for committing or concealing abuse.
- **Harmonization and cooperation:** European coordination to facilitate investigation, transfer of digital evidence, and uniform enforcement of rules by Internet services.w

## GAPS SECTOR 1: POLICY, LEGISLATION, AND GOVERNANCE

- Several bodies are responsible for child protection, but there is no coordination between them, leading to situations where information is lost for victims or professionals, and care is slowed down.
- In connection with this first shortcoming, there is a high degree of opacity in France regarding information and little clarity on the distribution of responsibilities related to the protection of children online. For example, the Secretariat for Digital Affairs was initially attached to the Ministry of National Education and then to the Ministry of the Economy, changing the composition of ministerial cabinets and therefore the points of contact for civil society.
- Despite the ambitious nature of its missions, Arcom has limited resources, with a small budget and only 23 staff to enforce the DSA (compared to 60 in Germany, for example). The organization is sometimes described as a complex and unresponsive bureaucracy, leading to criticism of its inefficiency and inability to adapt to contemporary digital challenges.
- Slow judicial procedures and insufficient resources impede law enforcement agencies's ability to ensure effective enforcement of the law.
- Lack of European consensus on the issue of encryption: lifting it would facilitate investigations into CSAM, but would pose numerous legal and fundamental rights protection issues. This controversy is slowing down the adoption of the CSAM Directive, despite recent legislative progress in criminalizing AIG-CSAM.



## SECTOR 2: Criminal Justice

- Effective and successful child sexual abuse investigations, convictions, and offender management
- Law Enforcement and judiciary have the knowledge, skills, systems, and tools required to enable them to perform victim-centric investigations and secure positive judicial outcomes.
- Child sexual abuse offenders are managed and reoffending prevented

### CAPACITY 3: Dedicated Law Enforcement

- Human and technical capabilities to investigate child sexual abuse online and offline, including cross-border cases
- Trauma-informed training for law enforcement
- Coordination with victim support services

#### Findings:

In France, law enforcement responsibilities related to OCSEA are divided among several competent institutions.

#### ► Under the National Directorate of the Judicial Police (DNPJ):

Within the National Police, 1,100 officers are assigned to cases involving offences against minors.

#### ► Office for Minors (OFMIN) of the Judicial Police

Created in **2023**,<sup>1</sup> the Office centralizes the handling of offences committed against minors, including online crimes. It oversees the most serious investigations, retaining those with the highest level of gravity, and redistributes the remaining cases to regional units. The OFMIN operates under the authority of the **Public Prosecutor's Office of Nanterre**. Territorial allocation may depend on the identification of the perpetrator or victim, or the location of the offence. However, **livestreaming cases** fall under the jurisdiction of the **Public Prosecutor's Office of Paris** due to their international dimension.

The OFMIN is composed of **50 investigators**, including **35 active officers**, and is organized as follows:

- Operational Division
  - **Online Child Sexual Abuse (CSA) Section**, composed of two investigation groups and two initiative groups dedicated to online CSA. This section conducts judicial investigations into online offenders based on reports received via dedicated platforms, or through proactive investigations.
  - **General Crimes Against Minors Section**, composed of two investigation and support groups. This section handles judicial investigations into sexual violence against minors and, more broadly, complex, sensitive, and/or international cases. It also provides operational support to regional law enforcement units.
  - **Criminal Intelligence Unit (Unité de Renseignement Criminel - URC)**, responsible for sorting and assigning reports, screening, and criminal analysis. Staffed by **four officers**, this unit handles the reception of international reports, particularly from the U.S. **National Center for Missing and Exploited Children (NCMEC)**. As there is **no automated system** for processing

1. <https://www.legifrance.gouv.fr/jorf/id/JORFTEXT000048007181>

these reports, sorting is performed manually, based on human assessment of urgency. In **2024**, out of **165,000 NCMEC** reports, the URC processed **2,200**, which were then forwarded to OFMIN investigators or other competent services.

- **Strategic Division**

- **Investigation Support Office**, responsible for developing operational doctrine, providing procedural assistance to regional units, and preparing the “Minors Plan.”
- **Steering Office**, responsible for threat assessment, coordinating the judicial “minors” sector, proposing legislative reforms, and organizing orientation committees.
- **European and International Cooperation Office**, responsible for monitoring EU legislation, representing France internationally, and participating in task forces and cooperation programs.
- **Partnerships and Communication Office**, responsible for stakeholder relations and public communication.

OFMIN serves as **France’s main international contact point** in the field of child sexual abuse investigations. As such, it receives all international reports. In **2024**, OFMIN received **165,000 reports** from **NCMEC (USA)**, **658** from **INTERPOL (NCB)**, **119** from Europol (**SIENA**), **74** from National Child Exploitation Crime Centre **NCECC (Canada)**, **94** from **other international sources**. For **overseas territories**, the following reports were recorded: Guadeloupe: **809**; Réunion: **10,121**; French Guiana: **876**; French Polynesia: **661**; Martinique: **748**; Mayotte: **1,963**; New Caledonia: **966**; Saint-Barthélemy: **19**; Saint-Martin: **50**; Saint-Pierre-et-Miquelon: **16**; Wallis and Futuna: **23**.

The Global Platform to End Child Exploitation (GPCEP) of NCMEC, which includes the number of CyberTips by country and year, reports **140,000 tips for metropolitan France and 16,252 tips from French overseas territories**, totaling **156,252 in 2024**. The difference with the **165,000** figure can be explained by the fact that GPCEP data only includes CyberTipline

reports classified as “tips” and excludes informational reports, which are also made available to the relevant agencies. Some discrepancies may also occur due to the delay between receiving a report and forwarding it.

- ▶ **Anti-Cybercrime Office (Office anti-cybercriminalité - OFAC)**

This office is responsible nationwide for handling cyberattacks against IT systems and illicit activities on the dark web, as well as for managing and coordinating the **national cyber plan**, which involves all stakeholders (police, gendarmerie, etc.).

Attached to this office are the **Pharos platform**, dedicated to reporting illegal online content, and the **Thésée platform**, which allows online filing of complaints for certain internet fraud cases.

- **Pharos – Platform for Harmonization, Analysis, Cross-Checking, and Routing of Reports**

Pharos is the **national reporting platform** that processes reports of publicly disseminated illegal online content. Originally created to combat child pornography, its scope has expanded since **2009** to cover all types of illegal web content. The platform is located in **Nanterre**, within OFAC’s **Sub-Directorate for Cybercrime (SDLC) of the Central Directorate of the Judicial Police (DCPJ)**.

Pharos has around **40 officers** distributed across different divisions (discrimination, reporting, judicial follow-up, site takedown). Regarding child sexual abuse, **six investigators** are assigned across day and night shifts, allowing 24/7 activity. Initially staffed by both police and gendarmerie officers, the number of gendarmerie investigators has declined in recent years. Pharos receives reports from the public regarding child sexual abuse.

- **Thésée**

The SDLC of the DCPJ developed the first public online complaint filing service, available since 2022 (Thésée). Its goals are to facilitate filing of

complaints by victims (individuals, adults), modernize internal security, enhance investigative efficiency, and focus litigation on international relations. Judicially, the Public Prosecutor of Nanterre is the referring authority.

▸ **Victim Support Platform (PNAV)<sup>2</sup>**

Also aimed at adults, PNAV provides confidential, tailored digital support with specially trained police or gendarmerie officers. It is free and accessible 24/7, staffed by about 50 officers who provide guidance, and procedural support.

► **Under the National Gendarmerie**

At the territorial level, the Gendarmerie has deployed a few **pilot units specialized in offences against minors**, ranging from family protection houses to research centers.

▸ **National Cyber Unit of the Gendarmerie (UNC-RCC)**

A **nationally competent judicial police unit**, UNC conducts high-level cybercrime investigations and coordinates the UNC branches and **Cyber gendarmerie** (Cybergend), covering metropolitan and overseas territories.

Staffed by **130 personnel**, UNC has three divisions:

- **Intelligence Coordination Division (Darc):** supports human intelligence, open-source intelligence, Computer Emergency Response Teams for the Gendarmerie Nationale (CERT-GN), national/international coordination, etc.
- **Technical Division (Division Technique - DT):** provides technical and forensic support and can be deployed nationwide to assist local units.
- **Operations Division (Division Opérationnelle - DO):** handles

organized cybercrime and national, European, and international cases (child sexual abuse, ransomware, Dark Web, etc.).

UNC coordinates **over 10,000 Cybergend** officers across France and its **20 UNC branches** in metropolitan and overseas territories.

The **child sexual abuse specialized unit** includes **seven investigators**. Once a victim or perpetrator is identified, the UNC forwards the case to a local brigade for further investigation.

▸ **National Child Pornography Image Analysis Unit (Centre National d'Analyse des Images Pédocriminelles - CNAIP)**

Attached to the Gendarmerie and UNC, **CNAIP** is the only national unit specialized in victim identification from visual content. It is staffed by **three specialized investigators**.

► **Role of Civil Society**

Civil society contributes to reporting, triage, and judicial processing of reports. Key actors include:

- **Point de Contact Association** – EU-designated trusted flagger forwarding cases to Pharos
- **e-Enfance Association** – includes cyberbullying hotline 3018, also a trusted flagger
- **119 Hotline** – for reporting violence against minors

► **General Training**

Police and gendarmerie academies provide general training in criminal law, with little focus on **children's rights**, and there is no mandatory training on **child sexual abuse**. Officers can take voluntary courses on victim interviews or domestic violence. In local units, domestic violence training is neither **mandatory nor widespread**, focusing mainly on physical rather

2. <https://www.msecurite.interieur.gouv.fr/fr/demarches-en-ligne/portail-signalment-violences-sexuelles-sexistes>

than sexual abuse. Entry-level recruitment generally requires a **high school diploma**, with an average age of 21 or 22.

### ► **Specialized Units: Training, Investigative Tools, and International Cooperation**

Real specialization is acquired only in practice within **OFMIN** and **UNC**. For training on online child sexual abuse, both units rely on **foreign training (Europol, FBI)**. Ethical screening, moral background checks, and psychological evaluation are conducted prior to assignment.

- **OFMIN entry requirements:** high school diploma minimum, bachelor's degree for officers, master's degree for commissioners. Entry via national police or gendarmerie competitive exams, followed by school training and first field assignment. OFMIN typically requires **3–5 years of prior experience**. Recruitment considers judicial investigation experience, specialized training National Institute of Child Health and Human Development Protocol (NICHD), digital forensics), and psychological aptitude to handle highly distressing content.
- **UNC career path:** Gendarmerie school, initial brigade posting, **voluntary Judicial Police Officer (Officier de Police Judiciaire - OPJ)** qualification for further training and promotion. Cybersafety prevention programs (Family Protection Houses) provide first exposure to child sexual abuse cases.

### **Investigative support tools:**

**OFMIN:** Child Protection System (CPS), ICACCOPS, Europol EMPACT training, INTERPOL's International Child Sexual Exploitation (ICSE) database

**UNC:** ICACCOPS (read-only), ICSE

Both units have training for **undercover investigators (Enquêteurs Sous Pseudonyme - ESP)**. **No AI** tools are currently deployed in investigations due to privacy/facial recognition restrictions; only international discussions and conferences address emerging threats.

### **Case Volume:**

CIIVISE estimates **160,000 children abused** per year in France. Considering universal psychological and logistical barriers to reporting, OFMIN received **71,085 complaints** from individuals in **2024**. It identified **60 victims nationwide**, including **20 children rescued from ongoing abuse**, while CNAIP identified **32 victims** the same year.

### **Prevention and Partnerships:**

**UNC:** relies on Family Protection Houses for prevention and awareness.

**OFMIN:** responsible for **content-related prevention**, producing operational doctrines, guidance for health professionals, and materials for children with cognitive disorders, preschoolers, and "Mélanie rooms" (child interview rooms). Conducts awareness campaigns with schools, associations, the national police communications service (SICOP), and the **National Union of Influencers (Union des Métiers de l'Influence et des Créateurs de Contenu - UMIC)**. Provides training via **Canopé**, the national training network for State workers.

#### ▸ **Psychological Support**

**OFMIN:** works with the Operational Psychological Support Service (Service de Soutien Psychologique Opérationnel - SSPO), offering a **good practice guide** for staff exposed to child sexual abuse content. Investigators are advised to consult SSPO psychologists **three times a year**; visits are covered by the National Police. An on-site psychologist supports investigation-related needs.

**UNC:** a psychologist is present for the unit, with group sessions **twice a year** and individual sessions **annually**, not specific to child sexual

abuse.

#### ▸ Artificial Intelligence and Emerging Threats

French law enforcement treats AI-generated and real material equally. **AI cannot be used for investigations**, despite the growing threat. The **metaverse** is also a concern due to (1) insufficient technical resources for investigations, and (2) low awareness on the topic.

## CAPACITY 4: Judiciary and Prosecutors

- Specialized training on child sexual exploitation and abuse and technology-enabled offending
- Child-friendly and victim-centric protocols

### Findings:

#### ▶ Specialized Prosecutor's Offices

##### ▸ Juvenile Prosecutor's Offices

In the largest jurisdictions, specialized juvenile prosecutors exist. They are competent for cases involving **both minor victims and offenders**, including **online child sexual abuse cases**. These offices develop particular expertise in sexual offences, exploitation, and cybercrime.

##### ▸ Paris Prosecutor's Office

Has jurisdiction over cases of child sexual abuse livestreaming or complex transnational offences (international dimension).

##### ▸ Nanterre Prosecutor's Office

Central jurisdiction for OFMIN and competent for cases related to international reports and mass reporting processing.

#### ▶ Specialized Judges

##### ▸ Children's Judges and Specialized Juvenile Investigating Judges

Some jurisdictions appoint investigating judges specifically tasked with **juvenile cases**, handling complex CSEA cases (in-depth investigations, long procedures). In courts of appeal, **specialized chambers for minors** exist, competent to hear these cases in second instance.

#### ▶ Specialized Criminal Chambers

Many jurisdictions have **criminal chambers specialized in sexual offences and offences against minors**. These chambers allow better handling of the specific needs of child victims (vulnerability, adapted interviews, trauma impact).

#### ▶ Training and Tools

##### ▸ Specialized Training

Magistrates receive continuous training through the **National School for the Judiciary (Ecole Nationale de la Magistrature - ENM)**, with modules dedicated to **juvenile law, sexual offences**, and increasingly cybercrime (sextortion, "remote rape" [i.e. where a victim is coerced to commit perpetration without physical presence of the offender], online exploitation, digital evidence). **Adapted interview protocols** (e.g., NICHD protocol) are beginning to be integrated into judicial practices.

##### ▸ Digital and Legal Tools

The **Criminal Code** has incorporated specific criminal provisions to address the cyber dimension:

- **Law n° 2018-703 of August 3**, 2018 amended Article 227-22-2 of the Criminal Code (corruption and solicitation of minors via electronic means). This law explicitly criminalized solicitation "by electronic communication," covering sexual extortion.
- **Law n° 2021-478 of April 21**, 2021 strengthened the protection of minors against sexual abuse by setting clear age thresholds: automatically qualifying sexual acts with a minor under 15 as rape

or sexual assault (or under 18 in cases of incest). It also reinforced the legal framework for online offences against minors.

These changes clarified legal uncertainties and enabled magistrates to better address digital offences.

- **Draft Law Strengthening the Fight Against Child Sexual Abuse (PPL n° 369, 17th legislature, submitted October 15, 2024, under discussion)**

This text is still under discussion; provisions may change. At this writing, it contains:

- **Updating CSEA-related offences:** Integrates new offences or adaptation of existing ones to cover modern forms (sextortion, online sexual requests, etc.).
  - **Statute of limitations:** Extends the statute of limitation for sexual offences, particularly against minors.
  - **Clarification of rape/sexual assault definitions:** Explicitly introduces the notion of consent in the Criminal Code (Articles 222-22 and 222-23) to improve legal understanding.
  - **New aggravating circumstances:** For rape, increases penalties in cases where the offender knowingly records images of the crime, or in cases of ambush, entrapment, or deception.
  - **Mandatory training:** Requires professionals in child protection to be trained in detecting sexual offences against children.
  - **Procedural measures:** Extends or adapts the statute of limitations in certain cases, and improved audiovisual hearing of victims (adults in particular), subject to consent.
- **National Coordination and Oversight**
- **Directorate of Criminal Affairs and Pardons (Direction des affaires criminelles et des grâces - DACG), Ministry of Justice**

This directorate has a **national steering role**, issuing circulars to

prosecutors, monitoring legislative evolution, adapting criminal qualifications to new forms of CSEA, and promoting specialized practices (adapted interviews, digital expertise).

▸ **Specialized Cyber Prosecutors**

In addition to juvenile prosecutors, certain cyber-reference magistrates are designated to work with **OFAC** and **UNC** on online offences. These are magistrates trained on cyber issues and designated as reference point for the French territory.

In terms of adjudication and hearing of CSEA cases, France has several levels of judicial structures. However, there are **no fully separate** courts dedicated exclusively to this caseload; specialization occurs at the level of jurisdictions and actors.

► **Competent Jurisdictions**

▸ **Judicial Tribunal / Court of Assizes**

Sexual offences against minors are tried by the **criminal court (crime)** or **court of assizes (felony)**. Some jurisdictions have specialized divisions for offences against minors.

▸ **Specialized Juvenile Divisions**

Since 2003, some judicial tribunals and prosecutor's offices have specialized judges for minors, particularly in sexual violence or abuse cases. This was reinforced after 2010. These judges receive **specific training in child protection and adapted interview techniques**.

▸ **Specialized Chambers for Minor Offenders and Victims**

Some courts of appeal have **dedicated chambers for juvenile cases** (both victims and offenders) to ensure consistency, monitoring, and protection. These chambers often use **recorded interviews and protected rooms (Mélanie rooms)** to avoid direct confrontation with perpetrators.

▸ **Protection and Interview Mechanisms**

Decisions on minor interviews are made **case by case**; the minor is not always present. If present, they may be accompanied by a lawyer, association, or even a dog. There is no legal prohibition. Interview rooms themselves are not regulated by law but are organized locally by courts. For example, the Versailles Tribunal has a waiting room with toys. Victim support associations may also offer visits to courtrooms, e.g., in Paris, with educational materials explaining the procedure. These measures can be deployed nationwide. A trusted third party (psychologist, uninvolved parent, social worker) is present during interviews. France also uses **video interviews** (Article 706-52 of the Code of Criminal Procedure) and **Mélanie rooms**: the child is heard in a protected environment, without the offender present, and recordings can be used in court. Direct confrontation with the offender occurs only in rare, exceptional, judge-supervised cases.

Court hearings for minors are subject to **closed sessions**, which minors can request to lift. The French system prioritizes preventing the child from being victimized a second time. Children are guaranteed their **own lawyer**, separate from their parents' choice. Lawyers trained in juvenile cases can register with the Commission for Minors.

**Ad hoc administrators** play a key role when parents cannot defend their child's rights. France also uses **assistance dogs** for hearings and trials. These measures are not standardized and depend on local resources and case requirements. Priority is given to key stages of hearings.

Magistrates increasingly receive **training on minors and victim statements**, including initial training at ENM in modules for children's judges. Additional training exists on "the victim in criminal proceedings" and child-specific issues.

#### ▸ **Role of Victim Support Associations**

In France, victim support associations provide social, psychological, and legal assistance. The Code of Criminal Procedure allows prosecutors to

appoint or requisition such associations.

#### ▸ **Volume of Convictions**

Penalties for sexual crimes and exploitation against children are in the Penal Code and **scaled according to severity**, respecting the **proportionality principle** (Article 8 of the 1789 Declaration of Human Rights and Citizens, constitutional value).

- Articles **222-27 and following** cover sexual assault, with aggravating circumstances (victims under 15, incest, authority, multiple offenders), with sentences ranging **15–20 years**.
- Digital offences: possession of sexual images of minors (Art. 227-23 CP) punished with **five years imprisonment and €75,000 fine**; dissemination, production, and recording punished with **seven years and €100,000**; aggravated if victim under 15, up to **ten years and €300,000**.

The **principle of proportionality**: penalties escalate as infractions → offenses/crimes → felony. Aggravating factors (child's age, incest, authority, organized group, cyber dimension) increase sentences. Judges have discretion within legal ceilings. Since **April 21, 2021 (Schiappa II law)**, any sexual relation between an adult and a minor under 15 (or under 18 in case of incest) is automatically rape or sexual assault, clarifying and increasing penalties.

#### **Conviction statistics:**

- 2022–2023: **4,308 convictions** for sexual violence against minors in the national criminal record, including **661 for rape of minors**.<sup>3</sup>
- Publication *Violences sexuelles*: 2017–2022, out of an estimated 37,800 convictions for sexual violence (all types), around 4% are estimated to be of sexual assault on minors. Online/offline distinction is not systematic.<sup>4</sup>

3. Assemblée nationale, "Questions à l'Assemblée nationale", <http://questions.assemblee-nationale.fr>

4. Myriam Bouhoute, "Les violences sexuelles, près d'une condamnation sur six relève du viol", *Violences sexuelles*, 2023 - n°9, <https://www.justice.gouv.fr/documentation/etudes-et-statistiques/violences-sexuelles?utm>

## ► Understanding OCSEA Case Context

The **Directorate of Judicial Protection of Youth (DPJJ)**, Ministry of Justice, produces **analytical and mapping documents** on juvenile justice. For example, its **2024 Activity and Research Report mentions CSEA**.<sup>5</sup>

## ► Support for Judges and Prosecutors

The Ministry of Justice provides a **national psychological support unit** for magistrates handling heavy caseloads (sexual crimes, serious violence, juvenile cases). Confidential support is available via phone or referral. Each court of appeals has a **preventive medicine service** for psychological follow-up. Social service assistants exist but coverage is uneven. The ENM offers **continuous training on psychological impact management** for sensitive cases, particularly sexual crimes against minors. These modules are **not systematic or mandatory**. Magistrates' associations (e.g., Union Syndicale des Magistrats) advocate for better support due to **vicarious trauma risks** (burnout, depression, PTSD) from repeated exposure to child sexual abuse or cybercrime cases.

## CAPACITY 5: Offender Management Process

- Multi-agency system to identify, manage, and rehabilitate sex-offenders, and provide statutory tools (rehabilitation and education program, community supervision)

### Findings:

At the level of **minor sexual offenders**, France does not have a multi-agency system responsible for coordinating management and rehabilitation actions for children who commit sexual offenses in order to

prevent recidivism. These children are not tried in criminal courts before the age of 13, and educational follow-up measures can be implemented. Since penalties are not imposed on minors, rehabilitative measures for them are not required.

## ► Judicial Protection of Youth (Protection Judiciaire de la Jeunesse - PJJ)

The **Directorate for Judicial Protection of Youth (DPJJ)**, one of the five directorates of the Ministry of Justice, is responsible for all matters related to juvenile justice. Its mission is to protect, educate, and promote the social, educational, and professional integration of young people involved in judicial proceedings, in order to prevent recidivism. Composed of 9,500 professionals, including educators, psychologists, social workers, technical teachers, administrative staff, and managers, the PJJ supports juvenile offenders under measures or sentences imposed by the justice system, combining an educational mission with the application of judicial decisions. Its educators produce reports to inform magistrates and contribute to integration support. Among the resources at its disposal are **closed educational centers (Centres Educatifs Fermés - CEF) and juvenile detention facilities (Établissement pénitentiaire spécialisé pour mineurs - EPM)**.

## ► Resource Centers for Professionals Working with Sexual Violence Offenders (Centres de Ressources pour les Intervenants auprès des Auteurs de Violences Sexuelles - CRIAVS)

Additionally, the **CRIAVS**, discussed further in Section 5 of this assessment, have units that sometimes take charge of juvenile sexual offenders with multidisciplinary and psychiatric support. CRIAVS also operate the **STOP helpline**, enabling offenders who recognize their paraphilia to contact the service and request treatment. Recent changes in the juvenile justice penal code have introduced several modifications, including the creation

5. Bilan et programmation des activités de recherche, Direction de la protection judiciaire de la jeunesse, 2024, [https://www.justice.gouv.fr/sites/default/files/2025-03/rapport\\_activite\\_recherche\\_dpjj\\_2024.pdf](https://www.justice.gouv.fr/sites/default/files/2025-03/rapport_activite_recherche_dpjj_2024.pdf)

of different modules managed by magistrates, such as a **health module** that can include care for offenders. CRIAVS guide and determine the most suitable health pathway depending on the territory and the minor; they must be contacted by professionals and do not coordinate cases directly.

For **adult offenders**, there is no nationally coordinated multi-agency system. Existing treatments include medication, psychiatric support, or chemical castration for receptive offenders. This approach can sometimes work for those with paraphilia, but not all offenders fall into this category.

► **Judicial File for Sexual or Violent Offenders (Fichier Judiciaire des Auteurs d'Infractions Sexuelles ou Violentes - FIJAIS-V)**

France also has a registry of offenders of sexual violence against minors, provided they have been convicted. This is the **Judicial File for Sexual or Violent Offenders (FIJAIS-V)**. Offenders can request the deletion of their name from the registry if proceedings against them are dropped. FIJAIS-V is accessible only to **OPJs (Judicial Police Officers)** and justice professionals. Access by OPJs is done on a case-by-case basis through an individual request to the Ministry of Justice. International requests must be formalized through the **judicial assistance office of the Paris Public Prosecutor's Office**.

The FIJAIS-V has a **deterrence purpose**, monitoring residence and legal obligations, and allows verification of registered offenders in the event of new offenses. Sexual offenders against minors must provide their residence information and report any change of address. Offenders may need to provide proof of residence monthly, semi-annually, or annually, and for the most serious offenses, report in person monthly with proof of address. Failure to comply can result in **two years' imprisonment and €30,000 in fines**. Information is retained for 30 years for crimes or offenses punishable by at least ten years' imprisonment, and 20 years for

other cases.

In France, all personnel in contact with children are now subject to **background checks**. Additionally, French law provides prohibitions or restrictions that judges can order to regulate offenders' behavior in the community, such as bans on working with children, contacting children, internet access restrictions, or mandatory treatment without the need to justify the reason. Offenders can also be subject to **community service**. For the most serious offenses, prison services may implement **electronic monitoring within a defined perimeter**.

► **Profile of sexual offenders against children, online and offline**

Some studies exist to help develop an analytical understanding of the profiles of sexual offenders against children, both online and offline, but none have been coordinated nationally. The Ministry of Justice occasionally publishes criminal statistics and research reports (DPJJ, DACG, Mission de recherche Droit et Justice) that include data on sexual offenders. For example, the study on **juvenile sexual offenders (Mineurs Auteurs d'Infraction à Caractère Sexuel - MAICS)** (Mission de recherche Droit et Justice, 2019–2022) profiles young offenders, their trajectory, and their family and school environment.<sup>6</sup>

The **CIIVISE** has produced a report based on thousands of testimonies, providing insights into typical offender profiles (often close to the victims: family, acquaintances)<sup>7</sup>. The **Penitentiary Insertion and Probation Service (SPIP)** has also analyzed the management of convicted sexual offenders, describing their recidivism, socio-judicial follow-up, and treatment needs.<sup>8 9</sup> Further research on this topic is planned in the future, notably by researchers Barbara Smaniotto and Cédric Le Bodic.<sup>10</sup>

6. Ministère de la Justice, "Rapport MAICS 2024 – DJPJ", septembre 2024, [https://www.justice.gouv.fr/sites/default/files/2024-09/2024\\_dpjj\\_rapport\\_maics\\_2.pdf](https://www.justice.gouv.fr/sites/default/files/2024-09/2024_dpjj_rapport_maics_2.pdf)

7. CIIVISE, Violences sexuelles faites aux enfants : « On vous croit », novembre 2023, [https://www.ciivise.fr/sites/ciivise/files/2024-12/CIIVISE\\_Rapport\\_On\\_vous\\_croit\\_nov\\_2023.pdf](https://www.ciivise.fr/sites/ciivise/files/2024-12/CIIVISE_Rapport_On_vous_croit_nov_2023.pdf)

8. Sénat, Prévention de la récidive du viol : prendre en charge les auteurs pour éviter de nouvelles victimes, Rapport d'information n° 650 (2024-2025), déposé le 21 mai 2025, <https://www.senat.fr/rap/r24-650/r24-650.html>

9. Ministère de la Justice, Les condamnations en France, Rapport annuel 2023, publié en décembre 2024, <https://www.justice.gouv.fr/documentation/etudes-et-statistiques/condamnations-france-2023>

10. Elise Pelladeau, Barbara Smaniotto, Cédric Le Bodic, Magali Ravit, Marjorie Roques, et al., The offenders of online child pornography Hypotheses of psychic functioning with projective methods. XXIV Congress of the International Society of the Rorschach and Projective Methods, Jul 2024, Copenhagen, Denmark. (hal-05155173)

## CAPACITY 6: Access to Image Database

- National database with access to the INTERPOL's ICSE database for international collaboration, supported by alignment with terminology for CSAM categorization.

### Findings:

France has access to INTERPOL's International Child Sexual Exploitation database (ICSE), which is updated as part of ongoing investigations. Several units are connected to it: the Department of Offenses Against Persons (DAP) of the UNC, which also provides ICSE training; the OFMIN; PHAROS (also responsible for deconfliction when new reports arise); and the Internet Group of the Minors' Brigade of the Paris Public Prosecutor's Office.

France also maintains its own image and video database for child sexual abuse material (CSAM), with hashing capabilities, managed exclusively by the CNAIP: **CALIOPE**.

## GAPS SECTOR 2: CRIMINAL JUSTICE

- Training for law enforcement is too limited and rarely updated, both at schools and within specialized units. The Gendarmerie academy offers limited instruction on investigative techniques and very limited coverage of children's rights. No training is provided on OCSEA, and investigators rely on international trainings offered by organizations such as Europol, which remain infrequent (for example, only a single Europol training session per year).
- The number of law enforcement personnel is too small compared to the scale of OCSEA (six at Pharos, seven at the UNC, 35 at OFMIN), and psychological support for investigators is inadequate and insufficient.
- Judicial coverage is too limited for France's overseas territories, which are poorly staffed with investigators and weakly connected to networks of victim support associations.
- The lack of human resources and training results in insufficient follow-up of investigations at the local level. Once a report is passed to a brigade, its handling remains uncertain. There are also no training or tools related to AI, leaving investigators largely exposed to the evolving threat.
- The handling of reports (notably NCMEC reports) relies on very limited manual triage given the volume: less than 2% are processed.
- Prevention remains secondary and insufficiently integrated into the institutional response.
- Post-conviction follow-up on offenders is poorly documented, leaving a blind spot in recidivism management.
- Not all jurisdictions have dedicated juvenile prosecutors or magistrates trained in cyber cases, particularly outside major jurisdictions. There are also no mixed judicial units (magistrates and investigators) working in real time on mass reports, despite a rapidly increasing flow.
- The trauma-informed approach is weakly systematized in correctional courts and courts of appeal.
- Psychological support for prosecutors and judges is very limited, with persistent stigma. Few psychologists are specifically trained on judicial issues and exposure to child sexual abuse content.
- No organization is mandated for the medical management of minor sexual offenders, and consequently, resources, including human resources, to handle this are non-existent.
- There is a gap in care for non-judicialized minor offenders. For children under 13, the child protection component is handled at the territorial department level, but resources are uneven.
- Investigators' requests for information from the FIJAIS-V database are handled on a case-by-case basis, representing a long and cumbersome process.
- FIJAIS-V allows authorities to know the location of offenders but not their occupation or proximity to minors.
- FIJAIS-V remains offender-centered, not victim-centered. Victims cannot access the database to know if the offender is in prison or at liberty. Such access is reserved for judicial or authorized authorities. There is no official provision allowing the database to automatically inform a victim of an offender's release.
- France has investigations and studies on the profiles of child sexual offenders, but they are dispersed and often sector-specific (penitentiary, health, criminology, justice). Furthermore, they barely cover the overseas territories.



## SECTOR 3: Victim Support and Empowerment

- Appropriate support services for children and young people
- Children and young people have access to services that support them through the investigation and prosecution of crimes against them. They have access to shelter; specialized medical and psychological services; and rehabilitation, repatriation and resocialization services.

### CAPACITY 7: End-to-end Support

- Planned, integrated, and multi-stakeholder support for victims and survivors.
- Services are inclusive and sensitive to age, gender, sexuality, disability, and ethnicity.
- Psychological support across dedicated law enforcement, frontline workers accessing image databases, child protection workforce, and hotlines.

#### Findings:

##### ► Interministerial Delegation for Victim Support (DIAV)

The DIAV **coordinates the actions of different ministries regarding the follow-up and support of victims** of terrorism, mass accidents, natural disasters, serial disasters, and other criminal offenses. It ensures the effectiveness and improvement of victim support mechanisms and coordinates all ministerial actions in their relations with victim support

associations. The DIAV's interministerial team relies on the Service for Access to Law and Justice and Victim Support (SADJAV) of the Ministry of Justice and its Victim Support and Associative Policy Office (BAVPA), which designs and manages the Ministry of Justice's policy in favor of victims, allocates necessary funds to courts of appeals, and participates in support mechanisms for victims of large-scale events.

##### ▸ Victim Support

**France Victimes** is a federation of victim support associations dedicated to assisting victims. It brings together 130 victim support associations with 1,450 professionals who intervene free of charge, in a confidential and official capacity on behalf of the Ministry of Justice, to provide assistance and support to victims of offenses, based on Article 41 of the Code of Criminal Procedure. They can also intervene upon direct request from victims, either within or outside judicial proceedings. France Victimes also manages a free victim support hotline, available 7 days a week: **116 006**.

Support for victims has no fixed duration and is assessed on a case-by-case basis depending on the victim's needs and type of support (psychological, social, financial). Some victims may be eligible for a lifelong allowance if the harm suffered justifies it (serious or long-term damage).

##### ▸ Statutes of Limitation for Offenses

If the offenses fall outside of the statute of limitations, victims can still receive support if their status as a victim is recognized under another framework (e.g., recognition by a compensation commission, associative support, or sometimes by CIIVISE in its work). In such cases, the justice system will not prosecute the perpetrator, but psychological support

funded by the state remains accessible.

## CAPACITY 8: Child Protection Workforce

- Skilled, specialist statutory workforce trained, coordinated, and available to provide trauma-informed protection and support to children at risk of sexual abuse and exploitation online
- Guidelines for frontline professionals on emerging and complex issues such as child “self-generated” sexual material

### Findings:

#### ► Child Protection

##### ▸ Role of Territorial Departments Administrations

**Territorial Departments** [French administrative division of executive power] are responsible for child protection. Once a juvenile court judge makes a decision concerning a minor, the department is responsible for the follow-up of each child, including housing and the child’s needs if the parent cannot provide care. The Child Social Services (**ASE**) have the responsibility for providing these services without a national structure or centralization, as child protection has become a local prerogative. The State retains a supervisory role, especially when budgets are allocated to departments, but does not have tutelary authority. The child remains **under judicial oversight**. In principle, a child always has the same lawyer, the same judge, and the same educator. The Ministry of Education plays an important role in care and is the primary source of reports, notably through school health services.

##### ▸ Family Houses

Family Houses are structures set up by some departments or associations in partnership with local authorities. They usually provide a welcoming and meeting space for families, often free of charge and without an appointment. Their role is more preventive and educational, complementary

to child protection, without replacing judicial measures. Family Houses are also dependent on local authorities.

##### ▸ Legal and Judicial Process for Child Protection

In France, the legal and judicial process specific to child protection is structured between civil/administrative measures for immediate and educational protection, and criminal measures for punishing offenses.

##### ▸ Civil and Administrative Process

Based on the Code of Social Action and Families (CASF), the civil and administrative child protection process is organized around departmental actors via the **Unit for the Collection, Processing, and Evaluation of Concerning Information (CRIP)** and the ASE, which proposes support measures, educational assistance, or temporary care. The CRIP centralizes all concerning information about minors at risk or in danger. It evaluates the danger and decides either on voluntary administrative support or a judicial referral to the public prosecutor if the situation is serious.

##### ▸ Civil Judicial Procedure, Educational Assistance

Based on Articles 375 et seq. of the Civil Code, the civil judicial procedure involves the juvenile court judge, who, if the child is in danger regarding health, safety, morality, or whose education or development is seriously compromised, can take a series of measures. For example, the judge can order an **educational action in an open environment (AEMO)**, meaning educational support without separation. **Placement in foster care, a residential center, or an institution** may also be decided. Additional investigative measures such as expert assessments or social investigations can also be ordered. These measures are independent of criminal proceedings, so the judge can act even without a specific offense.

##### ▸ Criminal Procedure

Based on the Penal Code and the Code of Criminal Procedure, the criminal procedure sanctions perpetrators of abuse, violence, sexual abuse, or

severe negligence. Conducted by the public prosecutor, the investigating judge, and criminal courts, it can run parallel to civil procedures. The public prosecutor may order immediate protective measures, such as provisional placement for up to eight days, renewable.

#### ▸ Other Measures

- Protection orders (2010 law, reinforced in 2019): if a violent parent threatens the child or the other parent.
- Family court judges (JAF): can adjust parental authority to protect the child (e.g., suspend visitation rights).
- Minor victim as civil party: represented by a guardian ad litem or legal representative (except in case of conflict of interest).

### ► Child Protection Personnel

#### ▸ Training

No specific degree-based training exists for combating OCSEA. Associations such as the reporting line Point de Contact may access CSAM via specific agreements but not through formal training. However, it is now mandatory for all child professionals to obtain a “Certificate of Honorability,” proving no prior conviction for sexual violence against minors.

#### ▸ Psychological Support

For associations dedicated to OCSEA cases, psychological support is generally well integrated. For example, the Point de Contact Association includes a psychological interview during recruitment to assess the candidate’s ability to handle exposure to abusive content. Staff who view such content attend monthly one-hour individual meetings and receive prolonged support after finishing the content review, including after employment ends.

#### ▸ Interdisciplinary Teams for Child Protection

- Commission for Complex Cases

At the prefecture level, commissions for complex cases handle sexual offenders. Participants include law enforcement, ASE, magistrates, and the Ministry of Education, with a punitive rather than rehabilitative approach. These are local initiatives.

- Pediatric Units for Children in Danger (Unités d’Accueil Pédiatriques Enfants en Danger - UAPED)

France has several UAPED units, modeled on Barnahus, differing in that they focus on the judicial procedure rather than long-term care. At this writing, 88 UAPED units are deployed, with 27 more planned. UAPED units function as multidisciplinary initiatives, with experts such as magistrates, police officers, pediatricians, child psychiatrists, psychologists, forensic doctors, gynecologists, social services, child protection associations, and other child protection professionals involved. Pushed by the La Voix de l’Enfant association since the 2000s, two government plans in 2017 and 2019 supported the creation of UAPED units.<sup>1</sup>

UAPEDs follow child-adapted interview protocols, such as the NICHD Protocol. Interviews can be conducted by a trained police officer or gendarme, with a second investigator present in the technical room when possible. After the interview, a forensic medical examination and psychological assessment may be conducted by the multidisciplinary team (investigator, pediatrician-forensic doctor, psychologist, social worker) upon the prosecutor’s request and if the child’s physical and psychological state allows. For longer-term psychological care, UAPED professionals guide the child and family to appropriate specialized structures and implement protective measures requested by the prosecutor. In 2021, more than 6,000 children were supported across about 20 UAPED units.<sup>2</sup>

1. <https://www.lavoixdelenfant.org/tout-savoir-sur-les-unites-daccueil-pediatriques-enfants-en-danger/>  
 2. Section adapted directly from the La Voix de l’Enfant website

► **Protocols for Child Risk Assessment**

- 2022 Interministerial Guide “Child Protection: Identification and Reporting”: sets the framework for danger evaluation and CRIP–Public Prosecutor coordination.<sup>3</sup>
- Departmental Guidelines: each department must have standardized danger assessment tools (e.g., maltreatment risk assessment grids).
- ONPE (National Observatory for Child Protection): disseminates model protocols for evaluating and managing concerning information.

► **Protocols for Coordination Between Criminal Procedure Actors and Child Protection Actors**

The Code of Criminal Procedure defines the legal distribution of responsibilities among actors, including ASE and ad hoc administrators. Each department has a departmental victim support scheme and Local Committees for Victim Support for minors (Comités Locaux d’Aide aux Victimes - CLAV).

► **Local Committees for Victim Support for Minors (Comités Locaux d’Aide aux Victimes - CLAV)**

CLAVs are overseen by the public prosecutors and prefects, bringing together police, social actors, educators, health, and the Ministry of Education. DIAV is part of and coordinates these committees nationwide. Since 2022, CLAVs for minors exist as about 30 committees across France.

► **For Victim Support Associations**

Coordination agreements with other actors are necessary and in place. For example, France has a tripartite Safer Internet Centre, composed of



3. <https://solidarites.gouv.fr/protection-enfance?utm>

a helpline (e-Enfance 3018), a hotline (Point de Contact), and a victim support organization (Tralalère – Internet Sans Crainte). e-Enfance has technical, legal, and partnership agreements with other French helplines (119, Pharos, other European lines) and directly with institutions, such as the Ministries of Agriculture (for agricultural high schools) or Health (for adolescent hospitals). e-Enfance is also part of the INSAFE network.

### ► Coordination Specific to OCSEA Cases

The France Victims network operates with associations across the territory that welcome all victims. However, the cyber aspect is minimal; a more general approach covering sexual offenses “including online” is favored. For online offenses, prevention and awareness are emphasized, with little differentiation in victim support between online and offline cases. Associations primarily use the “information concerning a child” (Information Préoccupante - IP) procedure, which triggers multiple judicial actions.

## CAPACITY 9: Compensation, Remedies, and Complaints Arrangements

- Provision of measures to allow children and victims accessible support in compensation, legal remedies, and complaints procedures.

### Findings:

#### ► Recourse and Compensation for CSEA Victims

The **Commission for Compensation of Victims of Offenses (Commission d'Indemnisation des Victimes d'Infractions - CIVI)** is a specialized body responsible for providing financial compensation to victims of criminal offenses when they cannot obtain restitution from the perpetrator, insurance, or other organizations. CIVI is present in every judicial court.

Compensation may cover bodily harm, moral damage, financial losses, and material damage. The amount awarded can be full or partial, depending on the severity, nature, and consequences of the harm suffered. Once a claim is processed, compensation is paid to the victim through the **Guarantee Fund for Victims of Acts of Terrorism and Other Offenses (Fonds de Garantie des Victimes des actes de terrorisme et d'autres infractions - FGTI)**, in the name of national solidarity, which may later seek restitution from the responsible party.<sup>4</sup> To obtain compensation, CIVI must be petitioned within three years of the offense if no trial has occurred, or within one year of the final court decision if a trial has taken place.

#### ▸ Compensation

- Psychological care

Legislation provides compensation for psychological, aesthetic, educational, and other damages, based on established frameworks. **Damages are individualized** according to each victim's circumstances, after evaluation. Compensation is granted **only after a conviction** and is calculated as part of civil damages and interest, following an assessment and civil expertise.

- Guarantee Fund for Victims (Fonds de Garantie des Victimes des actes de terrorisme et d'autres infractions - FGTI)

This mechanism **compensates victims when the perpetrator is unknown or insolvent/incapable of paying**. Sexual violence, including offenses against minors, qualifies for compensation. Each victim is individually compensated based on their own harm (physical, psychological, material).

4. [www.service-public.fr](http://www.service-public.fr)

For total incapacity for work (Incapacité Totale de Travail - ITT), victims with more than 30 days of ITT can request automatic compensation; for sexual violence victims, compensation is granted regardless of ITT duration. In FGTI cases, psychological follow-up can be provided indefinitely in principle, though the actual number of sessions is determined by a medical expert who evaluates the harm.

- Legal Aid (Aide Juridictionnelle - AJ)

Legal aid is automatically granted for victims of sexual violence and rape, covering attorney fees and procedural costs regardless of financial situation. For child victims, financial capacity is not considered, as they are not expected to bear financial responsibility.

#### ► Recourse and Compensation for Legal Representatives

In France, when a child is a victim, the legal representative (parent, guardian) acts as the civil party in the criminal proceedings. If the representative suffers indirect harm (e.g., loss of income or housing due to the offender's incarceration), they can claim compensation **civilly**, but not criminally, as they are not direct victims. Civil claims are often linked to the criminal trial; the criminal court may rule on damages alongside the conviction. If the offense is not recognized criminally, civil compensation becomes much more difficult.

#### ► Summary Table:

Mechanism	For whom?	Type of compensation	Key condition
<b>CIVI</b>	Victims + guardians with their own harm	State compensation	Serious offense, three-year deadline
<b>Criminal procedure (civil party)</b>	Victim represented by guardian	Compensation by perpetrator	Perpetrator known and convicted
<b>Civil procedure</b>	Guardian	Economic/moral damages	May depend on criminal conviction
<b>Victim support associations</b>	All	Support, accompaniment	Non-judicial

## CAPACITY 10: Child Helpline

- Accessible to all children, nationwide, toll-free, available 24/7, voice and text based, offering confidential support and counseling with appropriate referral mechanisms
- Robust data protection systems
- Counselors with specific training in online harms

### Findings:

France has a telephone support service for children, which is part of the European tripartite **Safer Internet Centre**. In France, this service is provided by the association **e-Enfance**, which operates the listening line **3018**.

#### ▸ Composition

The helpline employs about twenty support employees in charge of receiving calls, from diverse backgrounds (psychology, law, sociology) and professions related to children (educators, social workers, law enforcement, teachers) to provide comprehensive support on digital issues, cyberbullying, and OCSEA. Call handlers undergo **two weeks of initial training**, followed by ongoing learning through weekly external interventions and **monthly supervision**. e-Enfance is recognized as a public utility organization and is officially certified by the state.

#### ▸ Type of support offered

The **3018 helpline** provides psychological support for children experiencing cyberviolence (cyberbullying, sexual extortion, revenge porn, exposure to harmful content); advice on online safety and collaboration with platforms for rapid removal of harmful content; legal assistance, guidance on filing complaints, and referral to specialized associations; support for parents and educators. Services are **free, anonymous, and available seven days**

**a week from 9 a.m. to 11 p.m.**, via chat, email, social networks, and messaging apps. When necessary, callers are referred to in-person care services.

#### ▸ National network and partnerships

The 3018 service can make referrals to private institutions and certain religious organizations, such as dioceses, and collaborates with the **Independent Commission on Sexual Abuse in the Church (Commission indépendante sur les abus sexuels dans l'Église - CIASE)**. It also works closely with the **Mission for Vigilance and Fight Against Sectarian Abuses (Mission interministérielle de vigilance et de lutte contre les dérives sectaires - Miviludes)**.

The **Ministry of National Education** has regularly promoted the helpline through its annual anti-bullying award, historically mentioning both dedicated bullying lines (3018 and 3020). Since 2023, **3018 is the single national helpline**, and the Ministry continues to promote it via campaigns through the **Government Information Service (Service d'Information du Gouvernement - SIG)**. Additional support and communication are funded by the **Interministerial Delegation for the Fight Against Racism, Anti-Semitism, and Anti-LGBT Hate (Délégation interministérielle à la lutte contre le racisme, l'antisémitisme et la haine anti-LGBT+ - DILCRAH)** and the **Ministry of Sports**, while the **Ministry of Agriculture** commissions posters featuring the helpline. The company **TransMédia of the French National Railways (Société Nationale des Chemins de Fer - SNCF)** displays messages about the service on digital panels in major train stations across France.

## GAPS SECTOR 3: VICTIM SUPPORT AND EMPOWERMENT

- There is no clear pathway for victims regarding information, support, and compensation throughout the entire legal process. This issue has been raised by associations to the CIIVISE. Responsibilities toward victims are often overlapping, and many actors are sometimes opaque or little known. Trusted flaggers are on the front line, but their responsibilities are not formally defined in practice.
- Within the France Victims network, there is no dedicated program for the care and specific support of CSEA victims. Institutional barriers prevent the development of a coordinated “Victim Doctrine” led by OFMIN.
- Compensation and support for victims through France Victims and other victim support associations in Overseas Territories is challenging due to time zone differences and limited resources.
- Support for victims with disabilities is largely insufficient, which can result in instances of neglect or mistreatment by child protection services.
- Guidance for victims regarding psychological, physical, and social reintegration remains unclear. Few lawyers are trained in juvenile litigation, and there is a lack of reports assessing psychological, social, medical, and legal risks, which could help victims navigate their future.
- Child protection services are heterogeneous, as they depend on the resources and political will of each department.
- The territorial coverage of UAPEDs remains uneven.
- Multidisciplinary teams are solely the result of local initiatives and depend on individual commitment.
- The procedure before the CIVI can be complex and often requires the assistance of a lawyer or association. Some victims or families may not dare to apply or are unaware that they can do so.
- Psychological or economic damages suffered by legal guardians are often less recognized or compensated, particularly if they are not well documented.



## SECTOR 4: Society and Culture

- Child sexual abuse prevented
- Children and young people are informed and empowered to protect themselves from child sexual abuse. Parents, care-givers, teachers and childcare professionals are better prepared to keep children safe from child sexual abuse, including addressing taboos surrounding sexual abuse.

### CAPACITY 11: Child Sexual Exploitation and Abuse Hotline

- Dedicated portals/hotlines for the public to report suspected online child sexual exploitation and abuse.
- Cooperation with law enforcement and the technology industry.

#### Findings:

##### ► Reporting of OCSEA Content

France has multiple resources allowing the public to report suspected cases of **OCSEA**. **PHAROS** is the government reporting portal for sexual exploitation of minors. France is among roughly fifteen EU countries receiving European grants for the **Safer Internet Centre**. In France, this includes:

- **Tralalère** – a resource and awareness center
- **Point de Contact** – a hotline and reporting platform
- **e-Enfance / 3018** – a helpline and reporting platform

##### ► Platform for the harmonization, analysis, cross-checking, and referral of reports (PHAROS)

As highlighted in Sector 2 of this study, PHAROS is the national platform handling reports of illegal content published online, including OCSEA. For pedocriminality, PHAROS employs six investigators working in shifts, allowing the platform to operate 24/7.

- **Civil Society Reporting Platform: Point de Contact**
  - Mission and Operation

**Point de Contact** is the first professional reporter to PHAROS and operates under a formal partnership agreement with the government platform. A common protocol manual sets out guidelines for this collaboration. The organization works with the **Ministry of the Interior** to combat all illicit online content, including sexual violence and exploitation of minors, incitement to hatred, and terrorist content. It also engages in **public awareness, education, and accountability** campaigns regarding illegal online behavior and content.<sup>1</sup>

- INHOPE

Point de Contact is a **founding member and president of INHOPE**, the international network of hotlines. Through INHOPE, it receives international reports and cooperates in the removal of child sexual exploitation content

1. <https://www.pointdecontact.net/a-propos/>

online. International reports are transmitted via **ICCAM**<sup>2</sup> and **ICSE databases**, accessible to INTERPOL agents for victim and perpetrator identification. Projects like C-PORT (run by INHOPE) enhance access to reports categorized as pedocriminal by Point de Contact, which are then made available to the **UNC** and **CNAIP**.

- Industry Cooperation

Cooperation with the industry is mostly **informal** and depends on relationships with hosting providers in France. For example, **OVHcloud**, a major French hosting provider and Point de Contact member, provides an Application Programming Interface (**API**) to facilitate content removal. When a verified report of pedocriminal content is received, technical information (URL, IP address, file ID) can be transmitted **automatically and securely** to OVH servers. This API streamlines the process, reducing reliance on email or manual procedures, while providing traceability.

#### ▸ **Visibility of Reporting Platforms**

PHAROS is well-known to the public thanks to regular government promotion. Point de Contact benefits from visibility via the **INHOPE network**. The **3018 hotline** has become a single, nationally recognized number for **cyber-harassment**, supported by reinforced public campaigns. However, **no national public campaigns** exist specifically on how to report **pedocriminal content**.

## **CAPACITY 12: Education Programs**

- National education program (including age-appropriate, accessible, and inclusive content) to raise awareness of all forms of child sexual exploitation and abuse – empowering children, parents, guardians, caregivers, and practitioners with relevant information.

- Systematic training for professionals in education, social care, and health.

### **Findings:**

#### ▶ **Public Educational Policies Against Child Sexual Exploitation (CSE), Online and Offline**

##### ▸ **Education on Emotional, Relational, and Sexual Life (Education à la vie affective et relationnelle et à la sexualité - EVARS)**

In France, education on emotional, relational, and sexual life (EVARS) has been legally required since Law No. 2001-588 of 4 July 2001. The Education Code now mandates sexual education in primary schools, middle schools, and high schools, with at least three sessions per year for each age group. The objectives are to:

- Provide information on puberty, sexuality, contraception, and STI prevention;
- Raise awareness of respect, gender equality, and prevention of sexist and sexual violence;
- Support the development of young people's emotional and relational life;
- Prevent risks related to digital environments (pornography, cyberbullying, online sexual exploitation).

In practice, these sessions are conducted by teachers and/or external facilitators (accredited associations, health professionals). The Higher Council for Curricula (Conseil supérieur des programmes) was consulted in June 2023 to clarify student learning objectives regarding new EVARS challenges, particularly online. The sexual education program, developed in consultation with experts, was first published in February 2025 after a nationwide consultation, providing structured guidance for teachers and

2. Secure software solution designed to collect, share, and categorize reports related to child sexual abuse material (CSAM), funded by the European Union. ICCAM is used by INHOPE member hotlines in various countries as well as by INTERPOL.

school staff.<sup>3</sup>

#### ▸ **Government Prevention Campaigns**

In recent years, several national campaigns have focused on sexual violence against children, including incest and online sexual content. For example, in 2024, the Ministry of Solidarity launched “Break the Silence: Together, Let’s Protect Our Children from Sexual Violence,” using multimedia content distributed via official information channels targeting children, parents, and professionals.<sup>4</sup> A campaign on child prostitution was launched in 2022 with films, posters, TV spots, digital media, social media platforms, and influencer partnerships.<sup>5</sup>

The **PHARE** program (Plan to Combat School Bullying) was expanded to all primary and middle schools in 2022 and to high schools in 2023. It includes ongoing awareness activities, training, bullying coordinators, resource teams, and “student ambassadors.”<sup>6</sup> A national campaign raising awareness of helplines for child victims or witnesses of violence was launched in summer 2025, including the 119 and 3018 numbers, with posters in schools and dissemination on social media.

#### ▸ **Civil Society Prevention Campaigns**

While the government is the main actor in awareness campaigns, civil society organizations also carry out national prevention efforts:

##### ▸ **Association against Violence on Minors (Association Contre les Violences sur Mineurs - CVM)**

Provides free digital resources for victims, families, and professionals to prevent all forms of violence against minors.

##### ▸ **e-Enfance**

In partnership with OFMIN, e-Enfance carries out school-based prevention

campaigns. In 2024, the government also promoted a broader anti-bullying campaign linked to the 3018 helpline.<sup>7</sup>

#### ▸ **CIIVISE**

Plans a campaign on sexual extortion targeting minors, expected in November 2025 (pending official confirmation).

#### ▶ **Care Facilities for Minors**

France has Child and Adolescent Medico-Psychological Centers (Centres Médico-Psychologiques pour Enfants et Adolescents - CMPEA), public units providing outpatient psychiatric care, prevention, diagnostics, and home interventions. They offer services such as individual consultations and family sessions, ensuring access to professionals specifically trained in childhood issues.

## **CAPACITY 13: Child Participation**

- Children and young people are encouraged and enabled to give ideas and influence policy and practice relating to child sexual exploitation and abuse.
- Child protection, children’s rights frameworks, and trauma-informed practice utilized when engaging children.

### **Findings:**

France does not have public policies that systematically ensure children’s participation in decision-making at the national level. Nevertheless, several bodies exist that include children’s voices.

3. <https://www.ih2ef.gouv.fr/leducation-la-vie-affective-et-relationnelle-et-la-sexualite-au-periscope-evars-7818>

4. <https://association-cvm.org/medias/campagne-de-sensibilisation-sur-les-violences-sexuelles-faites-aux-enfants-ministere-des-solidarites?utm>

5. <https://solidarites.gouv.fr/mineurs-victimes-de-prostitution-une-campagne-de-communication-pour-alerter?utm>

6. <https://www.education.gouv.fr/non-au-harcelement/phare-un-dispositif-de-lutte-contre-le-harcelement-l-ecole-323435?utm>

7. <https://www.youtube.com/watch?v=nB4cHsP14iw>

### ► **Municipal Youth Councils (Conseils municipaux de jeunes – CMJ)**

These councils provide spaces for young people aged 9 to 18 to engage in local life by proposing ideas, discussing projects, or participating in decisions affecting their daily lives. Participants may represent their municipality, act as spokespersons for other youth, convey concerns to elected officials, or take part in awareness campaigns. Parental consent is required for participation.

### ► **Parliament of Children (Parlement des enfants)**

Created in 1994 by the National Assembly and the Ministry of National Education, this initiative enables primary and middle school students to actively participate in democracy. Fifth graders, and since 2023, sixth graders (pupils between 10 and 11), are invited to draft a proposed law on a given societal theme. For the 2025–2026 school year, the focus is on protecting minors from the dangers of social networks.<sup>8</sup>

### ► **High School Life Council (Conseil de Vie Lycéenne – CVL)**

Present in every French high school, the CVL facilitates dialogue between students and school administration. It includes elected student representatives and members of the administration, staff, and parents. The CVL serves as a bridge between students and management, promoting a more democratic and participatory school environment.

### ► **National Initiatives to Gather Minors' Opinions on Child Sexual**

## Exploitation

### ▸ **Government Initiatives**

- CIVIISE Mirror Group

The CIVIISE formed a “mirror” group of about fifteen adolescents to give minors a central role in formulating recommendations. Three commission experts guided the group. In July 2025, the group presented 23 recommendations to the National Assembly, focusing on:

- (1) a questionnaire for adolescents or young adults who are incest survivors;
- (2) peer-support programs;
- (3) combating online pedocriminality.

At launch, the group included 16 children aged 14–17 from 13 departments, including three overseas departments (Réunion, Guyane, Mayotte). Some were under child protection services (ASE), some had disabilities supported by medical-educational professionals, and some were survivors of sexual abuse. The conclusions are available on the CIVIISE website.<sup>9</sup>

- Taquet Law (2022)

Aims to improve the situation of children under ASE supervision and modernize child protection professions to enhance coordination. It strengthened child protection bodies, giving the National Observatory for Child Protection (Observatoire National pour la Protection de l'Enfance - ONPE) a larger role in supporting public policy. The law also reinforced the role of foster caregivers through a national contract and a national registry of approvals, enhancing transparency and preventing previously flagged professionals from working elsewhere.<sup>10</sup> Measures were included to collect children's perspectives.

8. <https://www.parlementdesenfants.fr/>

9. <https://www.civise.fr/sites/civise/files/2025-07/Bappart%20Groupe%20Miroir.pdf>

10. <https://www.actionenfance.org/actualites/la-loi-taquet/>

### ▸ NGO and Observatory Initiatives

- ONPE

Under the Taquet Law, ONPE now submits an annual report to the government and parliament on various child protection topics.

- Parentality and Digital Education Observatory (OPEN)

Conducting a study on sexual exploitation of children in/for prostitution, with a significant online component. A field mission in Guyane is planned in 2026 to provide local, representative data including overseas territories.

- Program Against Sexual Exploitation of Minors (PARÉ)

Launched in December 2022 and part of the 2024 national strategy against prostitution and sexual exploitation, PARÉ promotes the identification, support, and orientation of at-risk youth and their families, as well as professionals.<sup>11</sup> The Réunionese association Tu Es Mon Autre (You Are My Other) provides training and interventions for overseas specificities. Collaboration with Point de Contact will collect quantitative data from overseas reports, which is not yet consolidated.<sup>12</sup>

## CAPACITY 14: Offender Prevention and Support Systems

- Support to prevent people with a sexual interest in children from abusing or accessing child sexual abuse material
- Support for convicted offenders as part of rehabilitation response
- Specialized support for children displaying harmful sexual behavior

### Findings:

#### ► Support Systems for Individuals with a Sexual Interest in Children

Helplines such as e-Enfance, have established protocols for handling callers who may be offenders. Additionally, there is a dedicated helpline specifically for individuals sexually attracted to children: Telephone Guidance and Prevention Service (STOP - Service Téléphonique d'Orientation et de Prévention pour les personnes attirées sexuellement par les enfants), managed by the French Federation of Resource Centers for Professionals Working with Sex Offenders (Fédération française des Centres Ressources pour les Intervenants auprès des Auteurs de Violences Sexuelles - FFCRIAVS).

#### ▸ Prevention of Offending and Access to Online CSAM

The STOP service is part of the secondary prevention mission of the CRIAVS. Created by the FFCRIAVS and the CRIAVS themselves, it is confidential and reachable through a non-premium number: 0806 23 10 63. Callers provide their department number to be directed to the nearest CRIAVS with the best knowledge of local care services. Launched nationally in 2021 after regional trials, it was officially supported by the Pacte pour l'Enfance. This service targets only individuals sexually attracted to children; it does not cover offenders without a paraphilia. The line offers evaluation and referral to care but is not a therapy or counseling helpline.

#### ▸ Referral to Support Services

- CRIAVS

Established in 2006, CRIAVS do not directly treat offenders. They support the professionals who work with offenders, guiding them to healthcare and non-clinical support networks. While psychiatric care addresses some offenders (e.g., paraphilic or personality disorders), others fall outside this

11. <https://www.droitdenfance.org/pare-prostitution-des-mineurs/>

12. <https://anmda.fr/fr/actualite/evnement/17-juin-2025-rencontres-pare-lutte-contre-lexploitation-sexuelle-des-mineurs>

scope. CRIAVS focus on referral, territorial coordination, and guidance for professionals working with offenders.

- CMP (Centres Médico-Psychologiques)

Individuals with a sexual interest in children may also access CMPs, which provide psychiatric and psychological consultations.

- Civil Society

L'Ange Bleu is an association supporting offenders, initially focusing on care and now on guidance and support. It offers support, referral to services, and an anonymous forum firmly opposing child sexual exploitation, targeted at individuals with a sexual interest in children.

- Other Initiatives

The OFMIN collaborated with EUROPOL and Norwegian police to create preventive pop-ups on peer-to-peer networks distributing CSAM, including a prevention message from the OFMIN operational lead informing users that sharing CSAM is illegal.

The European initiative EMPACT, led by Europol for CSAM, is developing a platform called HelpForYou, aimed at young people concerned about sexual behaviors, in which participating EU countries can engage.

### ► Professionals Supporting Offenders

Since 2008, CRIAVS members have joined under FFCRIAVS to pool tools, share expertise, conduct joint projects, and increase visibility nationally and internationally.<sup>13</sup> FFCRIAVS does not coordinate or govern CRIAVS; it serves as their spokesperson. The federation includes around 200 professionals nationwide. Following the 2015 regional reform, some regions now host multiple CRIAVS, sometimes with a central office and multiple branches, totaling 35 structures.

13. <https://www.ffcriavs.org/la-federation/ffcriavs/>

14. <http://theseas.reseaudoc.org>

CRIAVS serve professionals working with offenders rather than offenders themselves. They have six core missions:

1. Train professionals across disciplines, including joint, cross-field training.
2. Promote research on sexual offenders, at the intersection of medicine and social sciences.
3. Facilitate health-justice coordination and territorial coverage.
4. Provide clinical support, an “expert space” to advise professionals, identify clinical highlights, and suggest non-clinical interventions.
5. Provide access to documentation through the THESEE platform.<sup>14</sup>
6. Foster local prevention initiatives.
7. Each CRIAVS receives a basic funding allocation from the Ministry of Health, administered by psychiatric institutions. CRIAVS are hospital-affiliated and operate within the medical field; their professionals belong to psychiatry and hospital services.

## CAPACITY 15: Informed and Ethical Media Reporting

- Evidence-based and sensitive reporting that respects victims' and survivors' rights and dignity.

### Findings:

#### ► Organization of Media Unions

In France, the main journalists' union is the **National Union of Journalists**

**(Syndicat national des journalistes - SNJ)**, which plays a central role in defending journalistic ethics and rights.<sup>15</sup> Additionally, the **General Information Alliance for press (Alliance de la presse d'information Générale)** was formed in 2018 by uniting the four historical unions of daily and equivalent press. This organization represents nearly 300 political and general news publications, major players in national, regional, and local democratic debate and pluralism of expression.<sup>16</sup>

### ► Main National Media

France has a diverse media ecosystem across print, agencies, television, and radio:

- Print Media: Le Monde, Le Figaro, Libération, Les Échos, L'Humanité, L'Opinion, etc.
- Agencies: AFP (Agence France-Presse).
- Television: France Télévisions (public service), TF1, M6, Arte, Canal+, etc.
- Radio: Radio France (France Inter, France Info), RTL, Europe 1, RMC, etc.

### ► Ethical Protocols on Publishing Information Related to Crimes Against Children

There are professional guidelines and charters that journalists, editors, and media outlets are encouraged to follow: professional codes of ethics, UNICEF-France recommendations on child protection in the media, and internal editorial best practices. These documents cover anonymization, respecting dignity, avoiding revictimization, and special precautions for minors.

For audiovisual media, Arcom provides specific resources and deliberations

15. <http://snj.fr>

16. <https://www.alliancepresse.fr/notre-histoire/>

on protecting young audiences and program classification. These rules impose practical obligations on audiovisual publishers. Various legal and regulatory frameworks also apply:

- **Civil Law:** Recent provisions (e.g., the law of February 19, 2024) strengthen children's image rights and regulate the dissemination of content concerning them.
  - Parents are primarily responsible for protecting the child's image, including in the context of "**sharenting**" (sharing children's media on social networks), under Article 371-1.
- **Data Protection:** Following a public consultation in 2020, CNIL engaged minors in workshops to gather their perspectives. CNIL issued recommendations for minors, parents, educators, and online service providers.
- **Audiovisual Rules:** Arcom sets ethical and protective obligations for broadcasters regarding young audiences.

**National Plan Against Violence Towards Children 2023–2027:** This includes awareness campaigns led by the state and widely relayed by media. Media participation is primarily collaborative and voluntary.

## GAPS - SECTOR 4: SOCIETY AND CULTURE

- Despite the good visibility of PHAROS, Point de Contact, and the 3018 helpline, no national campaign specifically targets the reporting of CSAM. Likewise, no recent large-scale national campaign focuses solely on CSAM or all aspects of online child sexual exploitation (OCSE), such as sextortion, deepfakes, etc., with broad visibility to all audiences.
- Regarding EVARS: multiple reports highlight a large gap between legal obligations and reality. Sessions are organized very unevenly across schools and are sometimes rare or entirely absent. Although sexuality education has been mandatory since 2001 with three sessions per year, fewer than 15% of students actually receive them.<sup>1</sup> The Inspection Générale de l'Éducation, du Sport et de la Recherche (IGESR) found that a very small percentage of students actually attend the legally mandated sessions, demonstrating non-compliance with the obligation.<sup>2</sup>
- Awareness and prevention campaigns target children, parents, and professionals, but messages are often standardized, without fine-tuning according to age, socio-educational background, culture, or digital access.
- There are still too few initiatives to systematically collect minors' opinions at the government level.
- The STOP hotline managed by CRIAVS is only for orientation and assessment. Telephone-based evaluation has significant limitations and is not an emergency line. Furthermore, at its launch in 2021, no additional resources were provided to CRIAVS to support this new mission, leading to very uneven results: the CRIAVS in some Departments listed the hotline on a mobile phone with standard office hours, while others made it available only half a day per week.
- The digital dimension of OCSEA is still poorly addressed in research and is therefore only weakly integrated into considerations of offender care.
- Community Support in France: Support groups are weak, with poorly established models. There are very few community-based associations for offenders; L'Ange Bleu is run by only one person, and there are virtually no other offender support associations. Support remains predominantly online, with groups that can sometimes become sites of reoffending. Offenders are minimally accompanied, and their families even less so. The focus remains on therapeutic care rather than community support, which does not cover for any case where offenders act for non medical reasons. Restorative justice initiatives are led solely by the judicial system rather than jointly by community and associative actors. CRIAVS assist associations participating in restorative justice, but they are rarely actively involved in practice.
- CRIAVS' adaptation to new offenses is uneven, with sometimes very limited budgets and teams that have barely changed. Structures remain highly disparate in their responsiveness to needs. In Overseas France, CRIAVS face specific challenges due to geographical distance from the mainland and from ministerial oversight.

1. Rapporteuses : Cécile Gondard-Lalanne Evanne Jeanne-Rose, "Éduquer à la vie affective, relationnelle et sexuelle. Avis et rapport du Conseil économique, social et environnemental sur proposition de la délégation aux Droits des femmes et à l'égalité", 2024-013 NOR : CESL1100013X, JOURNAL OFFICIEL DE LA RÉPUBLIQUE FRANÇAISE, [avis-du-cese-evars-100924.pdf](#)

2. Rapport d'activité de l'Inspection générale de l'éducation, du sport et de la recherche, 2023-2024, [rapport-d-activit-de-l-inspection-g-n-rale-de-l-ducation-du-sport-et-de-la-recherche-2023-2024-226184.pdf](#)



## SECTOR 5: Industry

- Industry engaged in developing solutions to prevent and tackle child sexual abuse
- The public can proactively report child sexual abuse offences. Industry has the power and willingness to block and remove child sexual abuse material online and proactively address local child sexual abuse issues.

### CAPACITY 16: Takedown Procedures and Reporting

- Local removal and blocking of child sexual abuse material online.
- Procedures for timely removal of child sexual abuse material when a company confirms its presence.
- Statutory protections for industry to report child sexual abuse, including content transmission to law enforcement or a designated agency.
- Global and cross-sector collaboration.

#### Findings:

#### ► Legislation Regarding Companies and the Reporting/Removal of CSAM from Servers

- **LCEN (2004) and the Digital Republic Law (2016)**

In France, the **Law for Confidence in the Digital Economy (LCEN, 2004)**,<sup>1</sup> particularly Articles 6-1 to 6-2-2, reinforced by the SREN Law (2024) and the Digital Republic Law (2016), requires hosting providers and online platforms to report and remove illegal content, including CSAM. Companies must also transmit reports to PHAROS and cooperate with judicial authorities.

If operators or service providers fail to comply with child protection obligations, **Arcom** can demand the closure of the operators. Hosting providers and online platforms are obliged to apply national legislation and ensure an interface with authorities.

- Example: Meta

For Meta, content removal is performed via automated global procedures (AI tools, hashing, partnerships such as the Global Internet Forum to Counter Terrorism/Tech Coalition). Meta France is responsible for local cooperation and liaison with French authorities.

#### ► **Blocking CSAM During Removal from International Private Servers**

A procedure exists requiring **ISPs** to block access to CSAM while the content is being removed from international servers. **Decree No. 2022-1567 of December 13, 2022** mandates “blocking and removal” of CSAM and requires retention of data related to content removal for six months for investigative purposes. This procedure relies mainly on:

- French law, including the Digital Republic Law (2016) and specific provisions on combating online child sexual exploitation, which obliges ISPs to cooperate with authorities to block reported illegal

1. [https://www.legifrance.gouv.fr/loda/article\\_lc/LEGIARTI000044067469](https://www.legifrance.gouv.fr/loda/article_lc/LEGIARTI000044067469)

content.

- PHAROS platform: once content is reported and identified, PHAROS can request French ISPs to block access to it on national territory.
- Decree of March 10, 2021, which formalizes the judicial procedure for blocking websites distributing child sexual abuse content.

### ► Provisional Blocking Order

If content is not removed promptly, under LCEN of June 21, 2004,<sup>2</sup> French judicial authorities may issue a **provisional blocking order**. The order is notified to French ISPs, which are legally required to block access to the targeted sites or content on their networks, preventing French users from accessing it. The **judge of injunctions** may urgently require hosts or service providers to take any measures necessary to stop or prevent damage caused by content on an online communication service (Art. 6-I-8).

### ► Technical Implementation of Blocking

ISPs implement technical measures (**DNS blocking, IP, or URL filtering**) to prevent access to targeted content or sites. These measures are temporary, pending the permanent removal of content. **PHAROS** and authorities monitor the effective removal.

Once content is removed from international servers, ISP blocks are lifted. Site or content owners may contest the decision in court. Blocking measures are regularly reviewed to ensure proportionality and compliance with the law.

- Example: Meta France

Meta France has a dedicated team for online security and law enforcement

liaison. This team manages local implementation, compliance monitoring, and coordination with Meta International. Shared data is limited, respecting **GDPR**, and is transmitted only to competent authorities.

## CAPACITY 17: Innovative Solution Development

- Technological solutions to prevent and address OCSEA.

### Findings:

#### ► French Technology Industry

France has a technology sector with sovereign infrastructures capable of hosting sensitive data, including OCSEA. Several French companies provide hosting services meeting strict security standards, ensuring that data remains on national territory. Examples include:

- Déessi, specialized in hosting sensitive data, offering advanced security measures, access traceability, regular audits, and continuous monitoring.<sup>3</sup>
- OVHcloud, European cloud leader, providing solutions for sensitive and critical data with infrastructure in France. OVH offers an API for automatic removal of reported content.<sup>4</sup>
- Leviia, 100% French sovereign cloud with servers exclusively in France.<sup>5</sup>
- Naitways, cloud solutions with data hosted in French data centers.<sup>6</sup>

2. [https://www.legifrance.gouv.fr/loda/article\\_lc/LIARTI000044067469](https://www.legifrance.gouv.fr/loda/article_lc/LIARTI000044067469)

3. <https://www.deessi.si/cloud-et-services-hebergement-de-donnees-sensibles/?utm>

4. <https://www.ovhcloud.com/fr/solutions/industries/manufacturing/?utm>

5. <https://www.levia.com/levia-drive-pro/?utm>

6. <https://www.naitways.com/nos-guides/guide-cloud/protger-ses-donnees-sensibles-les-avantages-dune-solution-de-stockage-securisee-en-france/?utm>

- Dstny France Entreprises, certified hosting solutions for sensitive data.<sup>7</sup>
- Zeendoc, cloud storage solutions with servers located in France.<sup>8</sup>

### ► Content Removal by the Industry

France does not have a national hosting infrastructure specifically for CSAM; storage is limited to judicial authorities and secure systems like PHAROS. Online services are legally forbidden from keeping CSAM, but may retain digital hashes to prevent redistribution. According to INHOPE's 2024 annual report, out of 2.5 million contents processed, 1.6 million were CSAM. France had long been among the top five, sometimes top three, hosting countries in Europe for such content but fell below these positions in 2024, reflecting improved handling by hosts.<sup>9</sup> Associations like Caméléon focus on the transnational nature of online child sexual exploitation and livestreaming, noting CSAM on French platforms depicting abuse in other countries.<sup>10</sup>

### ► CSAM Identification by the National Industry

There is no French hash database. Authorities and the national industry mainly rely on the NCMEC CSAM hash database, used by U.S. companies and available in France when services permit. Identification technologies are largely used by public authorities; law enforcement can access international tools like Microsoft PhotoDNA or Griffeye Analyze DI, subject to training and funding.

### ► Startups and R&D Initiatives

Several startups support the fight against online child sexual exploitation by providing technological services and training for law enforcement. For

instance, French and British company OSINT Industries offers open-source investigative tools free of charge to support authorities.<sup>11</sup>

### ► Reporting by the National Industry

ISPs increasingly use AI to detect and remove CSAM. For example, in Meta's answers to the U.S. Senate in January 2024, the company detected 99% of CSAM on Facebook and 95% on Instagram before user reports.<sup>12</sup> This indicates a capacity of proactive detection facilitated by automated technologies. In its transparency report for the third trimester of 2023, TikTok showed that 96.1% of violating content had been removed proactively with 90.6% removed within 24 hours.<sup>13</sup> Furthermore, Google now uses machine learning to identify previously unseen CSAM images.<sup>14</sup>

French tech companies are legally obliged to report CSAM to authorities; U.S.-based companies must also report to NCMEC. Reporting typically involves:

1. Detection (using technical tools).
2. Verification of illegality.
3. Reporting to PHAROS for content removal.
4. Law enforcement may request additional information through CNIL.

Major platforms have dedicated reporting units.

#### ▸ Internal Identification and Reporting Protocols

Most large national companies maintain internal protocols:

Regular staff training on recognizing online child sexual exploitation content.

Guides and manuals for detection and evaluation of suspicious content.

7. <https://www.dstny.fr/blog/hebergement-de-donnees?utm>

8. <https://www.zeendoc.com/nos-conseils/top-5-des-solutions-cloud-pour-les-entreprises-francaises/?utm>

9. <https://inhope.org/media/site/41f00cc3d9-1743600476/inhope-annual-report-2024.pdf>

10. <https://www.cameleon-association.org/nos-domaines-intervention/>

11. <https://www.osintindustries/>

12. Meta Platforms, Responses to Questions for the Record, Senate Judiciary Committee, January 31, 2024, 3. <https://www.judiciary.senate.gov/imo/media/doc/2024-01-31-qfr-responses-zuckerberg1.pdf>

13. TikTok, Responses to Questions for the Record, Senate Judiciary Committee, January 31, 2024, 2. <https://www.judiciary.senate.gov/imo/media/doc/2024-01-31-qfr-responses-chew.pdf>

14. Technology Coalition, An Update on Voluntary Detection of CSAM, April 11, 2024. <https://technologycoalition.org/resources/update-on-voluntary-detection-of-csam/>

Standardized internal escalation to specialized analysis teams.

Reporting via PHAROS, with strict deadlines and zero-tolerance policies.

Collaboration with authorities for evidence sharing and investigative support.

### ► Support Programs for Moderation Staff

Only major international platforms have documented programs to support staff exposed to CSAM, including specialized training, psychological support, task rotation; and access to internal psychologists or enhanced medical coverage.

However, moderation practices have generally decreased since 2024 following corporate decisions in major tech companies.

### ► Post-Reporting Orientation

French law requires platforms to allow reporting (with certain exemptions at the European level), but does not mandate directing users to PHAROS. Relevant laws include:

- Digital Republic Law (2016): transparency, user protection, facilitation of illegal content reporting, and platform accountability.
- Avia Law (2019): It strengthened the obligation for platforms to quickly remove illegal content, which entails providing users with accessible tools to report OCSEA. Shortly after its adoption, on June 18, 2020, the Constitutional Council struck down a large portion of the key measures of the Avia Law, ruling that they infringed on freedom of expression and the presumption of innocence. Some provisions regarding improved reporting, cooperation with authorities, and actions against online hate were maintained.

Despite this annulment, the principles of the Avia Law have inspired other legislative measures.<sup>15</sup>

- Law No. 2020-766 (2020): mandates preventive and reporting measures for illegal content, particularly affecting children, and transposes EU online safety provisions.

### ► Automated CSAM Detection and Law Enforcement Collaboration

Startups and cybersecurity/AI companies develop solutions for automated CSAM detection, often partnering with authorities through public-private initiatives.

Major platforms have systems to facilitate law enforcement collaboration and automate legal information requests:

- Meta: Law Enforcement Online Request (LEOR)<sup>16</sup>
- Google/YouTube: Law Enforcement Request System (LERS)<sup>17</sup>
- Zoom: LERS<sup>18</sup>
- X (formerly Twitter): Legal Request Submissions<sup>19</sup>
- Snapchat: Law Enforcement Guide<sup>20</sup>
- Amazon: Law Enforcement Request Tracker (LERT)<sup>21</sup>

### ► Public-Private Partnerships

Public-private partnerships exist through collaborations between ministries and private companies. Examples include the collaboration of Orange's legal public affairs department working with French ministries. Additionally, Meta France's research center in Paris collaborates on CSAM detection, human trafficking prevention, OSINT, and initiatives like Tech Coalition, LANTERN (inter-platform content sharing), and Take It Down (non-consensual sexual content removal).

15. <https://www.vie-publique.fr/loi/268070-loi-avia-lutte-contre-les-contenus-haineux-sur-internet>

16. <https://www.facebook.com/records/login/>

17. [https://lers.google.com/signup\\_v2](https://lers.google.com/signup_v2)

18. <https://lers.zoom.us/>

19. <https://legalrequests.x.com/>

20. <https://values.snap.com/safety/safety-enforcement>

21. <https://ler.amazon.com/>

## CAPACITY 18: Responsible Business Conduct

- Child protection and safeguarding policies, due diligence, and remediation that address OCSEA.

Findings:

### ► Main Internet Service Providers

In France, the telecommunications market is dominated by four national operators: Orange, SFR, Bouygues Telecom, and Free. There are also several regional and alternative operators, including Coriolis, K-Net, and Nordnet.

### ► National and International Applications for Children

The most popular national and international apps for children in France are TikTok, Snapchat, Twitch, Instagram, WhatsApp, Netflix, Spotify, and YouTube. According to the study by the agency heaven, “*Born Social*”:<sup>22</sup>

- Nearly **60% of children under 13** regularly use YouTube. Although a dedicated version exists (*YouTube Kids*), many young users prefer the standard version.
- Around **54.5% of children under 13** use Snapchat, despite the minimum **age requirement of 13**.
- TikTok is used by **44.2% of children under 13**.
- WhatsApp, intended for users aged 16 and above, is used by **39.8% of children aged 9–13**.
- Instagram is used by a significant proportion of young people. Meta has recently introduced adolescent accounts with enhanced privacy settings for users aged 13–17. Meta does not publish detailed

country-level statistics on minors, but indicates that **4 million adolescents** in France use default safety settings (parental controls, filters).

- Initially aimed at gamers, Discord is now used by many young people for online communication, with 3.6 million unique monthly visitors in France.
- Twitch, a live streaming platform primarily for video games, also attracts young viewers.
- The French real-time voice messaging app **Ten Ten** has quickly gained popularity among youth, raising privacy and safety concerns.<sup>23</sup>

Since **July 7, 2023**, France has established a “**digital majority**” at **15 years**, prohibiting minors under 15 from accessing social media without explicit parental consent. This measure aims to strengthen child protection against digital risks. However, the law is **not yet in force**; it must first be harmonized with European law, notably the RSN/DSA. In August 2023, the European Commission indicated that the law violated the DSA and that some provisions were adopted through a non-compliant procedure, rendering it inapplicable. In case of a deadlock at the European level, France plans to take unilateral measures.<sup>24</sup>

### ► Corporate Social Responsibility (CSR)

Responsible business conduct is implemented through three main areas:

1. prevention and education;
2. detection and cooperation;
3. compliance and regulation.

#### ▸ Prevention and Education

Age of first access to social networks and smartphones is a key preventive

22. <https://ler.amazon.com/>

23. Le Monde, “Ten Ten : tout comprendre à l’application au succès surprise, qui inquiète jusqu’au ministère de l’intérieur”, 2024, [https://www.lemonde.fr/pixels/article/2024/06/06/ten-ten-tout-comprendre-a-l-application-au-succes-surprise-qui-inquiete-jusqu-au-ministere-de-l-interieur\\_6237716\\_4408996.html](https://www.lemonde.fr/pixels/article/2024/06/06/ten-ten-tout-comprendre-a-l-application-au-succes-surprise-qui-inquiete-jusqu-au-ministere-de-l-interieur_6237716_4408996.html)

24. Toute L’Europe, “Pourquoi l’interdiction des réseaux sociaux aux moins de 15 ans voulue par la France est un casse-tête européen ?”, 2025, <https://www.touteleurope.eu/societe/pourquoi-l-interdiction-des-reseaux-sociaux-aux-moins-de-15-ans-voulue-par-la-france-est-un-casse-tete-europeen/>

lever. For instance, Orange focuses on prevention at the typical age of first smartphone use (around middle school) with workshops for parents and children, a parental guidance space “Bien vivre le digital,” and internal communication supported by civil society associations like **Caméléon** and **e-Enfance**. These partnerships provide free workshops on digital risks.

All companies operating in France must comply with the **Studer Law** (March 2, 2022), which requires all internet-connected devices sold in France to include a parental control feature. This applies to new and second-hand devices, must be easily accessible, and understandable. Personal data of minors collected through this system cannot be used for commercial or profiling purposes. The law protects minors from harmful content exposure and strengthens digital safety.

Teacher training on digital risks via **Canopé** and **OFMIN** is also available in partnership with companies.

#### ▸ **Detection and Cooperation**

Companies participate in the fight against OCSEA by investing in proactive detection technologies using **AI** or hashing, such as **PhotoDNA** by Microsoft.

##### ◦ **Meta**

Has implemented “Teen Accounts” (13–17 years) with default protective measures (private account, contact restrictions, night-time notification limits, 60-minute log-off reminders, contact only with existing friends/followers). Meta reports that **97% of adolescents aged 13–15** retain these default protections. Meta also conducts massive awareness campaigns (~1 million young people in France) and complies with the Studer Law through parental control tools.

##### ◦ **Google**

Offers technical tools such as **Content Safety API**.

##### ◦ **YouTube**

Provides reinforced settings for minors via **YouTube Kids**.

##### ◦ **TikTok**

Cooperates with **E-Enfance** and **Net Ecoute**, running awareness campaigns via youth influencers.

##### ◦ **Microsoft**

Creator of **PhotoDNA**, provides significant support to law enforcement.

Several partnerships are also structured around civil society initiatives.

#### ▸ **Compliance and regulation**

Some French companies provide specific responses to OCSEA, such as **Qwant**, a privacy-respecting search engine without targeted ads, and with proactive CSAM filtering via international databases. **Qwant Junior** is a child-safe search engine for ages 6–12, available only in France, filtering violent or pornographic content.<sup>25</sup> Qwant also partners with the French government to provide a safe digital environment and was integrated as the default search engine in government computers and phones in 2020.<sup>26</sup>

**Orange** plays a structuring role in national awareness campaigns, supporting events like **Safer Internet Day**.

European legislation imposes strengthened vigilance obligations to detect and remove CSAM, and several companies have adopted ethical labels in partnership with civil society.

#### ▶ **Artificial Intelligence: future risks**

National industry undertakes research to explore AI opportunities despite potential risks for minors. For instance, Meta conducts risk analyses on AI-related issues, such as watermarking AI-generated content, **AI detection of artificially generated content, and evaluating risks of AI misuse**.

25. <https://www.qwantjunior.com/>

26. Le Monde, “Qwant par défaut dans les ordinateurs de l’Etat”, 2020, [https://www.lemonde.fr/pixels/article/2020/01/09/qwant-par-defaut-dans-les-ordinateurs-de-l-etat\\_6025332\\_4408996.html?utm\\_source=chatgpt.com](https://www.lemonde.fr/pixels/article/2020/01/09/qwant-par-defaut-dans-les-ordinateurs-de-l-etat_6025332_4408996.html?utm_source=chatgpt.com)

## GAPS SECTOR 5: INDUSTRY

- There is no national hash database. Although Arcom has expressed its intention to develop one, it does not yet exist. As a result, French industry makes very limited use of hashing to identify already known CSAM on its platforms.
- Moderation and internal protocols: Some major platforms operating in France have moderation teams, but their internal protocols are not always made public. The CNIL and the Conseil Supérieur de l'Audiovisuel have encouraged platforms to strengthen their support mechanisms, but few independent studies provide detailed insights into these practices within French companies.
- Age verification: challenges remain in ensuring the effectiveness of the measures implemented by companies for verifying users' ages.
- Limited public-private partnerships: Collaborations that would combine the technological capabilities of companies with the investigative and victim-support capacities of law enforcement, the judiciary, and victim assistance organizations remain underdeveloped.



## Sector 6: Research and Data

- Awareness raised among the public, professionals, and policy makers
- Potential future offenders are deterred. Child sexual abuse offending and reoffending is reduced.

### CAPACITY 19: Research and Data

Data, research, and analysis on the threat of and response to OCSEA.

Robust administrative data systems (e.g. police, courts, social services) to monitor service delivery, access and effectiveness and provide regular insights for decision-makers.

Findings:

#### ► State of Research on Responses to CSEA in France

Observatory of Digital Technology

Digital observatories are public organizations providing regular information on the state and evolution of digital sectors, and on the diffusion of digital technologies in the economy and society. These include the Observatory of Digital Technology, created to analyze the evolution of science, technology, information, and communication (STIC) sectors, and to compare France's digital diffusion with major economic partners.

#### ► Digital Barometer

The Digital Barometer, conducted by Arcep, Arcom, the General Council of the Economy (CGE), and the National Agency for Territorial Cohesion

(ANCT), measures adoption of digital equipment and usage in France. It analyzes trends in internet access, digital tools, online behavior, and digital inclusion.<sup>1</sup> According to the 2025 Digital Barometer, Arcep reports that 40% of people aged 12 and older own at least one connected device, and 33% own a smart speaker.<sup>2</sup>

The France Num Barometer, published by the Directorate General of Enterprises, tracks perceptions and usage of digital technologies among French SMEs and micro-enterprises. It examines the challenges of digital transformation and the digital solutions implemented to enhance competitiveness.

#### Title: **Share of the population connecting exclusively via mobile**

Scope: Entire population aged 12 and over, in %



(Source: Baromètre du numérique 2025, Arcep)

1. [www.Arcep.fr](http://www.Arcep.fr)

2. Arcep, "Le Baromètre du numérique", 2025, <https://www.Arcep.fr/cartes-et-donnees/nos-publications-chiffres/barometre-du-numerique/le-barometre-du-numerique-edition-2025.html>

### ▸ Partnerships with Industry

Orange France conducts multiple structured digital prevention and education initiatives:

- Through the initiative #ForGoodConnections / Bien vivre le digital, Orange has sensitized nearly 500,000 children since 2021 on responsible digital use, with a target of 1 million children by 2027.
- The playful workshop “Les Magiciens du Numérique” (ages 9–14), in partnership with e-Enfance and the Ligue de l’Enseignement, develops children’s digital critical thinking through an escape-game format lasting 45–60 minutes.
- Collaborating with sports federations (notably the French Football Federation), Orange organizes workshops combining physical activity, discussion, and digital literacy for young people.
- For parents on first smartphone usage, Orange provides practical guides and workshops (in stores or online), such as “Mieux comprendre la vie numérique des ados,” complementing the SaferPhone offer.

### ► Public Policies and Qualitative/Quantitative Research on OCSEA at National Level

Online Platforms Observatory

Arcom has set up an **Online Platforms Observatory** to better understand audiences of very large online platforms and search engines (VLOPSEs)

<sup>3</sup>and other platforms potentially subject to the EU Digital Services Act (DSA) in France. This observatory tracks usage trends for minors and adults and informs regulatory action. Facebook and YouTube attract the largest number of visitors, while Snapchat and TikTok capture most of users’ time online. Certain regulated marketplaces have high traffic, e.g., LeBonCoin (27 million monthly unique visitors). French platforms like Dailymotion reach 20 million monthly visitors. Minor users (ages 12–17) heavily use Snapchat and TikTok, spending most of their online time there. Pornographic sites are also frequently visited by minors: about 40% of 12–17-year-olds access adult sites monthly, mainly via VLOP Pornhub (one-third of minors), exceeding adult usage rates.<sup>4</sup>

#### ▸ Plan to Combat Violence Against Children 2023–2027

Launched by the government, this plan strengthens prevention, detection, and care for child victims, drawing on CIIVISE work and scientific data. Approximately 160,000 children are victims of sexual violence annually, 77% within the family.<sup>5</sup> Vulnerability is particularly high for children with disabilities, who are nearly three times more likely to become victims. According to a 2021 INSERM survey, 13% of women and 5.5% of men reported experiencing sexual violence in childhood, including 4.6% of women and 1.2% of men experiencing incest.<sup>6</sup>

#### ◦ FFCRIAVS: Pathways of Minors Who Commit Sexual Violence

Within the 2023–2027 plan, FFCRIAVS organized a public hearing with 40 experts and civil society representatives. The resulting report included 45 proposals under four priorities:

1. Better understanding: collect minors’ perspectives and structure data collection.
2. Early evaluation and support: specialized educational devices, systematic referral to juvenile judges, national guidance for

3. (AliExpress, Amazon Store, App Store, Pornhub, Booking.com, Google Search, Google Play, Google Maps, Google Shopping, YouTube, Shein, LinkedIn, Facebook, Instagram, Bing, XNXX, Pinterest, Snapchat, Stripchat, TikTok, X, Temu, XVideos, Wikipedia, Zalando)

4. [Pornographie en ligne : de nouvelles étapes franchies pour la protection des mineurs | Arcom](#)

5. <https://solidarites.gouv.fr/plan-de-lutte-contre-les-violences-faites-aux-enfants-2023-2027>

6. Inserm, “Syndrome de fatigue chronique : Une vraie maladie ?”, Magazine de l’Inserm n° 52, 2021, <https://www.calameo.com/books/0051544501710fd07cf22>

professionals.

3. Coordination among actors: inter-institutional framework agreements, restorative justice.
4. Prevention for protection: support for parenting, education on affective, relational, and sexual life at school, effective control of pornography access.

In France, 11,500 minors are prosecuted annually for sexual violence; around 30% of assaults against minors are committed by other minors.<sup>7</sup>

▸ **Ministry of Justice: Juvenile Protection Directorate (Protection Judiciaire de la Jeunesse - PJJ)**

PJJ publishes studies to enhance understanding of juvenile offenders. Recent studies include:

*“The Pathways of Minors Who Commit Sexual Offenses”* by Marie Romero<sup>8</sup>

This study focuses on the judicial pathways of minors who committed sexual offenses, who were monitored both through the criminal justice system and via specific support mechanisms between 2018 and 2022. It compares their sociodemographic characteristics, institutional and educational backgrounds, and trajectories with those of minors under PJJ supervision who did not commit sexual offenses. The report also examines the multiple intervention logics, overlaps, disruptions, and back-and-forth movements between different support mechanisms. The fact that these pathways are not linear is highlighted as a significant challenge.

- Minors Criminal Code (Code de la Justice Pénale des Mineurs - CJPM, 2023)<sup>9</sup>

The CJPM is the legal text that now structures the juvenile criminal justice

system in France. It brings together legislative and regulatory provisions specific to minors who commit offenses.

- DPJJ Report (April 2025) on “dual follow-ups” ASE/PJJ

“Double follow-ups” refer to situations in which the same young person is taken care of simultaneously or successively by both the ASE (Child Welfare Services) and the PJJ (Juvenile Justice Services). These are “borderline situations,” revealing tensions between a protective logic (civil) and a repressive logic (criminal). Their definition is unclear: often, it rather involves multiple forms of follow-up, also including medical-social support, disability services, and the national education system. Among the main findings of the report, complex and difficult-to-count situations are highlighted, as well as the absence of reliable official statistics.

Available data:

- These situations concern 10% of young people followed in the justice system (2010 panel).
- 20% of serious criminal justice trajectories began with an ASE placement.
- 12% of boys placed in ASE in the 1990s experienced a criminal justice measure.
- Approximately 15% of young people followed by medical-social services for disability are also ASE beneficiaries.<sup>10</sup>

The report emphasizes that these situations are predominantly among children from working-class families, marked by precarity, unemployment, poor housing conditions, addictions, domestic violence, and mental health issues. Faced with complex situations, institutions (ASE, PJJ, judges) implement “institutional bricolage,” such as civil placements used for criminal purposes, informal intermediaries, or solutions outside official mandates. Disability plays an ambiguous role: it can either mitigate

7. Fédération Française des CRIAVS, Audition publique 2025, “Parcours des mineurs auteurs de violences sexuelles”, [livret\\_audipub\\_maics\\_vd.pdf](#)

8. Ministère de la Justice, “Le parcours des mineurs auteurs d’infraction à caractère sexuel”, 2022, <https://www.justice.gouv.fr/documentation/ressources/recherche-mineurs-auteurs-dinfraction-caractere-sexuel-deuxieme-volet>

9. <https://www.justice.gouv.fr/code-justice-penale-mineurs>

10. Direction de la recherche, des études, de l’évaluation et des statistiques, 2022, [https://drees.solidarites-sante.gouv.fr/sites/default/files/2025-03/ER1331-enfants%20et%20ado%20handicape%CC%81s\\_MEL.pdf](https://drees.solidarites-sante.gouv.fr/sites/default/files/2025-03/ER1331-enfants%20et%20ado%20handicape%CC%81s_MEL.pdf)

or aggravate the criminal justice response. Turning 18 often results in exclusion from ASE/PJJ protection systems, with departments prioritizing younger individuals. These situations reinforce social inequalities from childhood. The accumulation of educational, familial, and social difficulties leads to a double stigma for children who are considered “at risk” but also perceived as “dangerous.”

▸ **Protocol for Preventing Minors’ Exposure to Pornography**

Signatory actors (ISPs, mobile operators, search engines, content providers, device manufacturers, child protection associations) commit to:

- Deploying and promoting parental control tools via a shared information portal.
- Measuring usage through relevant indicators.

Arcep and Arcom oversee implementation via a monthly committee of all signatories.<sup>11</sup>

- Parent Information Platform

“Je protège mon enfant” (“I Protect My Child”), an information platform for parents, launched in 2021 on Safer Internet Day, is a website dedicated to protecting minors from online pornography. This commitment protocol brings together actors from various sectors. Its implementation is overseen by a monitoring committee composed of all signatories and coordinated by Arcep and Arcom. The site, designed for parents, explains how to set up parental control tools and provides content and resources to facilitate open communication between parents and children.<sup>12</sup>

▶ **International Working Group: Joint Statement on Age Verification (2022)**

In 2022, several regulators convened within an international working group on the protection of minors, which resulted in a joint statement

on age verification (International Working Group Joint Statement on Age Verification). This statement was notably signed by Arcom on behalf of France. Its objectives were to affirm the necessity of effective age verification tools to protect minors; to highlight common challenges, including balancing child protection with privacy, technical feasibility, and cooperation with digital stakeholders; and finally, to promote international harmonization and strengthened cooperation among regulators, in order to prevent overly disparate approaches from creating gaps in protection.

▶ **Indicators for OCSEA Issues**

France uses indicators validated by ministries and observatories for national reports: prevalence estimates, police reports, judicial pathways, child protection measures, healthcare/psychological care, online reports, prevention, and training. Indicators are published by ONPE and inform international reporting, including under the Lanzarote Convention (Council of Europe). Ministries of Interior, Justice, and Health/Social Affairs report annually.

## CAPACITY 20: Universally Agreed Terminology

- Information and policies communicated clearly and in alignment with international standards.

**Findings:**

In France, the term still most commonly used in legal texts is “child pornography” (see Criminal Code, art. 227-23). For several years, under the impetus of the Council of Europe, the Lanzarote Committee, and the European Commission, France has been striving to replace this term with more appropriate formulations, such as:

11. Arcep, Le pôle numérique Arcep – Arcom, 2025, <https://www.Arcep.fr/la-regulation/grands-dossiers-thematiques-transverses/le-pole-numerique-Arcep-Arcom/protection-des-mineurs-contre-la-pornographie-en-ligne.html>

12. <https://jeprotegemonenfant.gouv.fr/>

- “Images of child sexual abuse” (IASE) or “child sexual abuse material” (CSAM).
- The term “pedopornographic material” is sometimes used in police and judicial practice. However, legally, the text of the Criminal Code has not yet been amended, so the official terminology remains far from the standards of the Luxembourg Guide.

Internally, within the relevant services, internal circulars and service notes already recommend using “images of child sexual abuse (IASE)” in reports. At the judiciary level, the 2023 general criminal policy circular (and previous circulars concerning violence against minors) advises terminological caution, recommending not to use the word “pornography” alone, as it trivializes sexual abuse. On the child protection side, the ONPE, CIIVISE, and official reports from the Ministry of Solidarity now use CSAM/IASE, in line with international standards.

## GAPS SECTOR 6: RESEARCH AND DATA

- Much research focuses on vulnerability, disability, or the penal or educational context, but few studies concentrate specifically on OCSEA or CSAM.
- The profiles of perpetrators of online sexual abuse against minors are not often isolated in studies, leaving significant gaps regarding their use of digital tools, their online modus operandi, etc.
- There is a lack of recent data on the impact of digital technologies and the internet on sexual offenses (beyond simple digital use as context or means of communication).
- Few studies examine sexual recidivism in connection with online exploitation or the specific legal consequences.
- Samples are sometimes small, regional, or not representative for certain types of online risk.
- The terminology used is not yet fully aligned with the Luxembourg Guide and international standards.
- The Lanzarote Committee has highlighted gaps and the need to harmonize the indicators used by France.

# RECOMMENDATIONS

## SECTOR 1: POLICY, LEGISLATION, AND GOVERNANCE

- **Short term**

**Reinstate** a budget commensurate with the ambitions of the DSA at Arcom, and ensure a stronger consultative component, taking inspiration from the British example of Ofcom, which conducts regular public consultations with users.

- **Medium term**

**Appoint** a body responsible for inter-ministerial and multisectoral coordination, covering both online and offline elements, with oversight of budget allocations and the national implementation of child protection policies against sexual abuse. This body would not aim to replace the

numerous existing structures but rather to map and coordinate them, serving as the main national reference point. Another key function would be the production of information and its dissemination through appropriate channels.

**Raise** the issue of encryption at the European level to align on a common position and standardize practices across Europe.

- **Long term**

**Increase** judicial budgets related to digital matters and integrate appropriate training into academies, linked to digital challenges.

## SECTOR 2: CRIMINAL JUSTICE

- **Short term**

**Make** training programs on child sexual offenses, particularly online, mandatory for any investigator working with cases involving minors. Given the importance of case law in unit work, require at least one course on sexual violence against minors at police and gendarmerie academies.

**Organize** at least annual training sessions in overseas territories with multidisciplinary teams.

In collaboration with the private sector, civil society, and AI-specialized organizations, create training programs on the technical use of AI by offenders, to understand the sources of AI-related offenses and improve judicial responses. Include private sector participation to facilitate dialogue and address France's technological lag, and encourage their participation in relevant hackathons.

**Develop** an automated system for sorting reports (ethical AI, priority classifiers, duplicate detection, geolocation) to reduce reliance on manual human evaluation. For solutions already in development, particularly via the private sector, facilitate state funding.

**Develop** technological partnerships with the EU and private sector (automated reporting, CSAM hashing, cryptanalysis).

**Structure** a true national OCSEA prevention program, coordinated by OFMIN: practical guides for teachers, educators, health professionals; online awareness programs; educational tools for parents and children (serious games, MOOC, digital campaigns); systematically partner with the Ministry of Education to train teachers and integrate prevention into school curricula.

**Integrate** trauma-informed modules at ENM, and provide regular training on magistrates' mental health and the positive impact on minors of a

trauma-informed judicial system.

**Allow**, under CNIL supervision and following joint research, the consolidation of FIJAIS-V requests when reasonably justified by investigative needs.

**Adopt** a victim-centered approach in monitoring convicted offenders: allow victims to receive notifications of offender release if they wish.

Create research calls to encourage multisectoral and cross-disciplinary studies on sexual offenders against minors, including in overseas territories.

- **Medium term**

**Invest** in European sovereign investigative support tools (equivalents of ICACCOPS or CPS) to reduce reliance on the FBI and foreign training.

Expand digital training (undercover investigations, Dark Web, tracing crypto-assets linked to CSAM) and reinforce cross-disciplinary judicial training (police, magistrates, victim support services).

Massively strengthen specialized personnel:

Quickly **reach** 85 investigators at OFMIN, then scale proportionally to the volume of reports (minimum x3).

**Increase** the number of investigators dedicated to Pharos (at least x2) to ensure effective 24/7 processing.

**Strengthen** the CNAIP unit (from three investigators to at least ten specialists in victim identification).

**Expand** UNC pedocriminality capacity (from seven to a minimum of 20 investigators).

**Include** school awareness campaigns to attract young investigators to the field.

## SECTOR 2: CRIMINAL JUSTICE

**Develop** CNIL-compliant AI oversight through private partnerships and research calls, exploring non-facial-recognition AI or non-intrusive assistive AI.

**Reinforce** socio-judicial monitoring and, when necessary, electronic measures to ensure non-contact obligations with minors are respected.

**Fund** therapy sessions within specialized units (three mandatory individual sessions per year) and allow subsidized access to external therapists anonymously.

**Harmonize** training on digital aspects of child-related offenses within ENM, so that all jurisdictions, including overseas and smaller metropolitan ones, are covered.

**Systematize** mixed judicial units (magistrates and investigators) in large jurisdictions working in real-time on mass reports.

**Systematize** psychological support for magistrates with at least three mandatory individual sessions per year, to overcome stigma and institutionalize the approach.

**Offer** ENM and police school training for psychologists on trauma-related issues in OCSEA cases, and promote these programs in psychology faculties.

**Enhance** the role of ad hoc administrators to support minor victims throughout the judicial process. Establish a structured departmental network to identify and monitor minor offenders, including non-judicialized cases, and define uniform care protocols including psychological evaluation, adapted educational measures, and family support. Strengthen local resources with specialized units, train professionals in recidivism prevention and tailored support, and implement monitoring indicators to measure intervention effectiveness and integration with judicial systems.

**Prohibit** offenders from residing in immediate proximity to schools, daycare centers, or any places where children gather daily.

- **Long term**

**Create** a pool of specialists in local units to serve as liaisons to central units.

**Form** a European-level legislative working group to study AI use compliant with data protection laws, aligned with evolving threats.

**Increase** resources for CRIAVS and expand their mandate to coordinate medical management of minor sexual offenders, supporting the PJJ in maintaining its educational and social reintegration role.

## SECTOR 3 VICTIM SUPPORT AND EMPOWERMENT

- **Short term**

**Formalize** the role of “trusted flaggers” and centralize all information on a single, nationally managed platform operated by the French government, directing victims and their families to available resources. This platform should be inclusive, age-appropriate, and clearly explain the legal, financial, psychological, and community support options available, depending on the type of digital-related offense.

**Include** associations supporting persons with disabilities in mandatory training on sexual violence, particularly offenses against minors. Integrate disability-awareness modules for all professionals in contact with children. Establish a minimum standard of care based on the “most vulnerable” principle: solutions should only be implemented if they are suitable for the most vulnerable. Among the 160,000 children sexually abused in France each year, at least 7,680 are children with disabilities, possibly more.

**Strengthen** training programs for lawyers handling juvenile cases, with specific modules included in bar training. Prepare guidance documents for reintegration into daily life to be provided to victims at the end of judicial proceedings, regardless of the outcome, listing associations, helplines, medical and psychological care centers, and other existing resources.

**Continue** the deployment of UAPED units, key actors in collecting the child’s testimony and providing care, aiming for one UAPED per jurisdiction quickly, including overseas territories, in line with the 2023–2027 Plan to Combat Violence Against Children.

- **Medium term**

**Facilitate** the development of a coordinated Victim Doctrine led by OFMIN, and deploy specific training programs for associations assisting victims of OCSEA.

**Create** a dedicated fund to standardize victim support and care practices, addressing inequalities in treatment across geographic and social contexts.

**Improve** coordination of actors on the ground by experimenting with ten departmental delegates for child protection to support prefects in implementing and articulating the fight against violence toward children and the prostitution of minors, in line with the 2023–2027 Plan. In addition to the plan’s recommendations, these delegates will be responsible for ensuring multidisciplinary coordination in each territory where they are deployed.

- **Long term**

**Establish** minimum budgets and initiatives for child protection at the national level, so that departmental discretion is subject to a uniform minimum standard.

**Enhance** victim and family information by distributing simplified and multilingual brochures in police stations, hospitals, France Services centers, and through victim support associations. Set up a free legal support system with offices staffed by specialized lawyers, complemented by government-recognized associative support to assist in preparing cases.

**Integrate** specific criteria for psychological and economic harm to relatives in CIVI assessment grids, and train magistrates, clerks, and experts to harmonize practices and improve recognition and compensation for these harms.

## SECTOR 4: SOCIETY AND CULTURE

- **Short term**

**Continue** strengthening listening and child testimony collection systems to enable preventive and awareness-raising capacities through helplines and improve working conditions for staff.

**Follow** the 2023–2027 Plan’s recommendation for a major annual national campaign, selecting themes in consultation with civil society.

**Integrate** children’s voices into campaigns as early as possible, for example, through school consultations or child-led governance bodies such as the Children’s Parliament.

**Launch** research grants on the digital dimension of sexual exploitation of children, including studies on perpetrators and the connection to care services.

- **Medium term**

**Establish** an annual, transparent national monitoring system for EVARS sessions, publishing results by institution, and designate a trained reference person in each institution to ensure the legal requirement of three sessions is met.

**Strengthen** initial and ongoing teacher training with an EVARS module covering equality, consent, sexual and digital violence, and provide appropriate educational materials.

**Mobilize** accredited associations to provide support in schools with dedicated funding, and implement control and incentive mechanisms, such as labels or funding conditional on the completion of sessions.

**Collect** children’s experiences and opinions regarding sexual exploitation, following the methodology used in large-scale school surveys, like those conducted by the Directorate for Evaluation, Foresight, and Performance (DEPP).

**Significantly** reinforce STOP helpline staff by systematically providing resources across all territories, increasing human resources with salary incentives, and ensuring professional phone lines operate on shifts so that no single person is solely responsible for a line.

- **Long term**

**Led** by departmental delegates, create multiple psychological and community support units for youth with sexually harmful behavior, including a dedicated helpline and possible group activities to implement prevention and awareness principles.

**Strengthen** and develop associations supporting offenders and their families by granting national accreditation, professional support, and dedicated funding, while facilitating the integration of ethically supervised research teams.

**Establish** a national charter and moderation framework to oversee online support groups and prevent recidivism.

**Set** up locally accessible family support groups and expand restorative justice programs by actively involving associations and civil society.

**Finally**, coordinate therapeutic care and community support by developing bridges between CRIAVS, associations, and local structures to offer integrated and preventive support.

## SECTOR 5: INDUSTRY

- **Medium term**

**Develop** a French hash database managed by Arcom, within which strictly regulated public-private partnership opportunities can be implemented. The database would be fed by judicial authorities and accredited associations to complement existing international databases.

**Make** it mandatory for major platforms operating in France to publish public reports detailing their moderation policies, reporting procedures, and victim support mechanisms, including quantified indicators on processing times and resolution rates. Establish regular audits by accredited external organizations to assess the effectiveness of moderation teams and compliance with legal and ethical obligations. Standardize and disseminate victim support protocols, including psychological support, referral to authorities, and post-report follow-up, while fostering a secure framework for sharing best practices between platforms and authorities. Require the publication of statistics on responsiveness, content removal or blocking, and monitoring of vulnerable users to make the system measurable and comparable.

- **Long term**

**Make** hash usage mandatory for all major platforms and hosting providers operating in France, enforcing the systematic integration of existing databases to immediately detect and remove known CSAM. For smaller actors, fund shared technical solutions to overcome technological and financial barriers. Require platforms to regularly report on the effectiveness of hash usage, with graduated sanctions for non-compliance, and encourage continuous development of robust hashing technologies, including those adapted to content modifications and AI-generated content.

**Agree** on a national approach to age verification that respects privacy, to standardize practices for platforms. This solution could be based on the European Commission's proposal of July 14, 2025, with an initial version of an EU "white-label" age verification plan, which would serve as the basis for privacy-respecting age verification across all Member States.

**Strengthen** cooperation between the private sector, law enforcement, justice authorities, and victim support associations by creating formalized protocols specifying roles, responsibilities, and secure information flows. Provide financial incentives or labels to recognize company engagement, while offering joint training programs and monitoring indicators to ensure coordination, effectiveness, and evaluation of these partnerships.

## SECTOR 6: RESEARCH AND DATA

- **Short term**

**Standardize** terminology: systematically adopt the terms and definitions from the Luxembourg Guide and international standards, and harmonize the indicators used by French institutions to facilitate international comparisons.

- **Medium term**

**Strengthen** targeted research on CSAM and OCSEA: fund university projects and public-private partnerships specifically dedicated to studying offenders' online behavior, digital profiles, modes of committing offenses, and the impact of digital tools. These funds could support doctoral opportunities co-financed by universities, private companies, and coordinated by a public ministry.

**Identify** civil society organizations and private sector actors with whom research partnerships on offenders, recidivism, and the geographic and digital diversity of risks could be facilitated.

- **Long term**

**Facilitate** secure access for researchers to reporting databases and anonymized judicial files under ethical oversight, in order to analyze trends and the effectiveness of prevention and sanction measures.

**Implement** national surveys and longitudinal panels including different types of victims and offenders, to obtain reliable data on prevalence, modus operandi, and recidivism.

## CONCLUSION

France has made significant progress, demonstrating its commitment to enhancing institutional capacities to respond to CSEA and OCSEA. Numerous initiatives have emerged in recent years, and several mechanisms now emphasize the voices of victims. Nevertheless, coordinating these various bodies, systems, and support mechanisms remains a major challenge, requiring victims and the professionals assisting them to undertake substantial efforts in searching for and navigating available resources.

The French territory continues to exhibit disparities in treatment between metropolitan France and overseas territories, and the inclusivity of practices remains a recurring issue, particularly for children with disabilities. By taking a decisive leadership role in the area of online child protection, and by anticipating technological developments shaping the sector, France could position itself as a model within the EU.

Achieving this will require adequate resources as well as political and institutional will to strengthen responses and support for victims, their families, investigators, and judges, and for professionals working alongside victims. It also involves addressing offenders, implementing preventive actions—particularly for minors—and systematizing open educational discussions along with protective, inclusive, and anticipatory measures that will help reduce the frequency of punitive interventions that must nevertheless continue.

