

## **Implementing a Public Health Approach to Prevent Technology-Facilitated Child Sexual Exploitation and Abuse: the Importance of Adding a Commercial Determinants of Harm Lens**

Technology-facilitated harms are now a major global public health and child protection challenge.

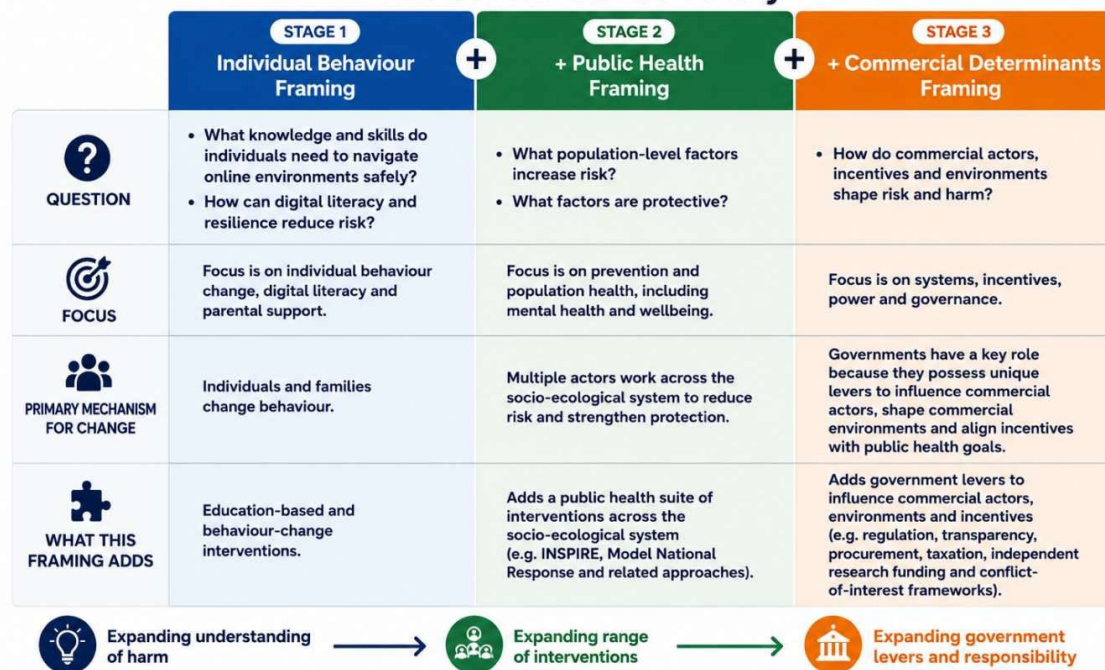
Our most recent Into the Light Global Index estimates, launched at the World Health Assembly in May 2026, highlight the scale of these harms. More than 300 million children report experiencing at least one type of technology-facilitated harm in the past year [3]. Approximately one in four children globally have experienced online sexual solicitation during their lifetime. In addition, 9.1% of males and females report experiencing online sexual extortion at some point during their childhood [4].

These harms occur at a scale and speed that challenge traditional approaches focused primarily on individual behaviour, including digital literacy and parental responsibility. While these remain important components of prevention, they do not fully explain why harmful exposures occur at such scale, nor why certain risks persist despite growing awareness, education and safeguarding efforts.

A public health approach to technology-facilitated harm focuses on the health, safety and wellbeing of entire populations. It seeks to maximise benefit across society by preventing harm before it occurs and by addressing the factors that increase or decrease risk. Public health approaches recognise that harms arise not only from individual behaviours, but from the interaction between individuals and their environment [5].

A commercial determinants of harm lens complements this public health lens and existing online safety approaches by examining how business models, product design, market incentives, data practices and corporate influence shape digital environments and ultimately patterns of harm. This perspective does not replace individual responsibility approaches. Rather, it expands the conversation by asking how online environments themselves can be designed and governed to reduce harm before it occurs.

## Why a Public Health Framing (with Commercial Determinants) Matters for Online Safety



A commercial determinants of harm lens has been applied to other areas where industry intersects with population health and well-being, including tobacco, alcohol, gambling, unhealthy food and drinks and road safety among the most prominent. All of these areas, some of which are huge public health successes, share common features. We've analysed the key industry tactics used within these areas across the evidence-base and present these below:



## Shaping Evidence and Narratives

Technology companies are significant funders of research, data infrastructure and evidence generation activities across the online safety ecosystem. Research on commercial determinants has consistently highlighted the importance of understanding who funds evidence and how knowledge is produced.

Data from the Into the Light Index, the only global index looking at the prevalence and nature of child sexual exploitation and abuse (CSEA) globally, approximately 80% of the organisations responsible for collecting, analysing and reporting global Child Sexual Abuse Material (CSAM) data receive direct or indirect funding from technology companies.

This observation should not be interpreted as criticism of these organisations or the quality of their work. Many perform essential child protection functions. Rather, it highlights a structural feature of the evidence ecosystem that commercial determinants research would encourage us to examine. When industry funding is concentrated within evidence-generating systems, questions naturally arise regarding transparency, independence, research priorities and long-term sustainability.

Technology companies are also major funders of university research, research centres, think tanks, conferences and policy initiatives. This creates a situation where industry can influence not only the production of evidence, but also the questions that are asked, the areas that receive investment and the voices that are amplified within policy debates.

Research across multiple industries has shown that commercial actors often seek to influence how problems are understood and how solutions are framed. Common approaches include emphasising individual responsibility, promoting education and awareness as the primary response to harm, presenting harms as affecting only a small minority of users and positioning industry as an essential partner in solving the problem. Similar narrative patterns can be observed within online safety debates, highlighting the importance of critically examining not only the evidence available, but also how problems and solutions are being defined.

## Shaping Policy and Child Protection Environments

Commercial determinants research highlights that influence is often exercised not only through direct lobbying, but also through investments in the wider systems that support policy development and implementation.

Within online safety and child protection, technology companies increasingly fund components of the broader protection ecosystem. This may include child helplines, reporting hotlines,

awareness campaigns, training programmes, conferences, academic partnerships, research initiatives and support for law enforcement activities.

Many of these investments provide genuine public benefit and support important child protection functions. However, evidence from other sectors suggests that reliance on industry funding can create challenges around independence, agenda-setting, institutional dependency and public trust.

For example, if core child protection infrastructure (for addressing online safety) relies heavily on industry support, questions may arise regarding the ability of those organisations to challenge industry practices, advocate for stronger regulation or pursue policy positions that may conflict with commercial interests. Similar questions have been raised across tobacco, alcohol, gambling, and pharmaceutical sectors.

A commercial determinants lens does not argue against collaboration between industry and child protection organisations. Rather, it encourages policymakers to consider how conflicts of interest are managed and how independent governance can be maintained while still benefiting from industry expertise and resources.

### **Government Levers for Action**

A key strength of a commercial determinants' framework is that it moves beyond describing problems and identifies practical mechanisms for change.

Governments possess unique powers that no other actors can exercise. These powers allow them to shape commercial environments, establish rules for markets, influence incentives, and protect public interests. Commercial determinants research therefore focuses not only on understanding how harm occurs but also on identifying the policy levers available to reduce that harm.

The central contribution of this framework is not that it replaces existing approaches to online safety. Rather, it provides an additional perspective that helps explain why harms occur, identifies opportunities for prevention upstream of individual behaviour, and offers a well-established evidence base from which policymakers can draw.

The common government levers used in other industry areas include: regulation, market shaping policies, conflict of interest frameworks, independent research funding, transparency, procurement practices and taxation and levies. In the figure below, each of these levers is highlighted including for which industries these levers have been used by government, examples and possible usage cases for online safety.

| GOVERNMENT LEVER<br>Key ways governments can shape commercial environments to reduce harm                                                                                                  | EXAMPLE FROM OTHER INDUSTRIES<br>How it has been used in other commercial determinants of health industries                                                  | HOW IT COULD BE USED FOR ONLINE SAFETY HARMS<br>Ways this lever can be explored or is already being applied in digital environments.                                                                                                                                                            | USED IN OTHER COMMERCIAL DETERMINANTS OF HEALTH INDUSTRIES<br>Industries where governments have used this lever |         |          |                         |                          |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------|---------|----------|-------------------------|--------------------------|
|                                                                                                                                                                                            |                                                                                                                                                              |                                                                                                                                                                                                                                                                                                 | TOBACCO                                                                                                         | ALCOHOL | GAMBLING | UNHEALTHY FOOD & DRINKS | ROAD SAFETY / AUTOMOTIVE |
|  <b>REGULATION</b><br>Set rules and standards to reduce harm and protect people.                          | E.g. Plain packaging and advertising bans for tobacco; limits on alcohol advertising; mandatory seatbelt laws and speed limits.                              |  Strengthen and expand regulatory frameworks for digital platforms (e.g. safety by design, risk assessments, algorithmic accountability, age verification, harmful content controls).                          | ✓                                                                                                               | ✓       | ✓        | ✓                       | ✓                        |
|  <b>MARKET-SHAPING POLICIES</b><br>Influence the conditions in which markets operate.                     | E.g. Zoning laws limiting alcohol outlet density; restrictions on fast food outlets near schools; plain packaging for tobacco.                               |  Restrictions on availability of certain digital products; limits on digital product availability in schools and public services.                                                                              | ✓                                                                                                               | ✓       | ✓        | ✓                       | ✓                        |
|  <b>CONFLICT OF INTEREST FRAMEWORKS</b><br>Protect decision-making from commercial influence.             | E.g. Journals require conflict of interest disclosures; governments require disclosures from advisors and researchers.                                       |  Require conflict of interest disclosures for researchers, advisors, experts and industry representatives involved in online safety policy, research and standards development.                                | ✓                                                                                                               | ✓       | ✓        | ✓                       | ✓                        |
|  <b>INDEPENDENT RESEARCH FUNDING</b><br>Fund high-quality, independent research, prevention and response. | E.g. Tobacco settlement funds independent research and prevention programs.                                                                                  |  Create dedicated, ring-fenced funding (e.g. from digital services levies) for independent research, prevention and response programs on online harms.                                                         | ✓                                                                                                               | ✓       | ✓        | ✓                       | ✓                        |
|  <b>TRANSPARENCY</b><br>Require disclosure of data, practices, content moderation and influence.          | E.g. Tobacco companies disclose marketing spend; alcohol industry reporting requirements; vehicle safety ratings made public.                                |  Move from self-transparency reporting to independent oversight and audits; public disclosure of algorithmic systems, content moderation practices and risk and harm data.                                     | ✓                                                                                                               | ✓       | ✓        | ✓                       | ✓                        |
|  <b>PROCUREMENT</b><br>Use purchasing power to promote health and safety.                               | E.g. Governments require vehicles to meet safety standards to be eligible for public contracts; public institutions require healthy food for school lunches. |  Government procurement of digital services only if companies are compliant with government regulation and online safety standards.                                                                          | —                                                                                                               | —       | —        | ✓                       | ✓                        |
|  <b>TAXATION AND LEVIES</b><br>Use price signals and revenue to reduce harm and fund action.            | E.g. Tobacco excise taxes; alcohol taxes; gambling taxes; sugar-sweetened beverage taxes; road use charges.                                                  |  Explore taxation or levy mechanisms for tech digital business models associated with higher risk or harm potential; use revenue to support independent research, prevention and response for online safety. | ✓                                                                                                               | ✓       | ✓        | ✓                       | ✓                        |

Moving towards a public health approach to online safety is an important and necessary step. However, a public health framework alone does not fully explain the underlying determinants that shape digital environments and influence patterns of harm. Many of these determinants are commercial in nature, arising from business models, product design choices, market incentives and the broader systems within which technology companies operate.

A commercial determinants of harm lens provides a means of moving beyond moral debates about individual responsibility and towards a more evidence-informed understanding of where commercial interests may conflict with child wellbeing, safety, and population health. It shifts attention upstream, from responding to harms after they occur to understanding and addressing the conditions that make those harms more likely to occur in the first place.

Only by considering both population-level determinants through a public health approach alongside commercial determinants can the online safety field develop truly comprehensive prevention strategies. Such an approach strengthens our ability not only to identify, respond to and mitigate harms in real time, but also to create digital environments that prevent harm from occurring in the first place. Ultimately, safeguarding children online requires more than helping individuals navigate risk. It requires addressing the systems that produce risk at scale.

#### Suggested Citation:

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#### References and Resources:

- [1] CDC website on the public health approach applied to preventing violence:  
<https://www.cdc.gov/violence-prevention/about/about-the-public-health-approach-to-violenceprevention.html>
- [2] INSPIRE Framework and Suite of Tools from the WHO:  
<https://www.who.int/publications/i/item/inspire-seven-strategies-for-ending-violence-against-children>
- [3] Fry, D., Krzeczowska, A., Anderson, N., Lu, M., Ren, J., Fang, X., & Into the Light Index Study Group (2025). Prevalence estimates and nature of online child sexual exploitation and abuse: A systematic review and meta-analysis. The Lancet Child & Adolescent Health, 9(3), 184193.  
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#### About the Childlight Lighthouse Series

The Childlight Lighthouse Series brings together practical resources derived from Childlight’s global research and evidence base. The series includes briefing papers, how-to guides, toolkits, typologies and standard operating procedures designed to support the framing, measurement, prevention and response to child sexual exploitation and abuse worldwide. Further resources in the Lighthouse Series can be accessed at: <https://www.childlight.org/lighthouse>