

Open call for evidence: Pornography regulation, legislation and enforcement

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The Prevalence of Illegal Pornography Online, and the Impact of Legal Online Pornography

1. What evidence can you provide on the public's attitudes towards pornography? This can include positive or negative attitudes from individuals of any age.

Christian teaching consistently opposes pornography. In Matthew 5:32, Jesus condemns “sexual immorality” (from the Greek word: porneia). Christian teaching continues to be opposition to pornography.

Covenant Eyes¹, a Christian ministry helping people leave pornography use, in their research find: 90% of teens and 96% of young adults are either encouraging, accepting, or neutral when they talk about porn with their friends; 55% of adults 25 and older believe porn is wrong; Teens and young adults 13-24 believe not recycling is worse than viewing pornography; 43% of teens believe porn is bad for society, compared to 31% of young adults 18-24, 51% of Millennials, 44% Gen-Xers, and 59% of Boomers.

Population-level studies of attitudes to pornography are rare. In Carroll et. al (2008), they studied college students and found 67% of men and 49% of women agreed that viewing pornography was an acceptable sexual expression. In Johansson & Hammaren (2007), a study of Swedish youth, 77.4% of young men and 28.4% of young women were positive towards pornography. Brown et. al (2017) showed that individuals who do not consume pornography are likely to have more negative attitudes towards pornography and vice versa.

A number of studies, quoted in Noll et. al (2022), show that men are more likely to consume and have positive attitudes towards pornography. Given that half of the UK adult population visited a pornographic website (based on OFCOM's 2021 Online Nation report²), it is likely that a significant proportion of those porn users have positive attitudes towards pornography.

On the other hand, there is a population group of porn users who have negative attitudes towards pornography, and hence the growth in organisations and ministries that help people leave pornography use.

In a 2014 survey of 18-year-olds, 72% said that pornography led to unrealistic views about sex and 80% said pornography puts pressure on girls to look and act in a certain way.³

The Children's Commissioners Report “Pornography and Young People”⁴ contained significant quotes of children's concerns about pornography. For example:

‘I believe pornography skews the perception of how adult relationships work and don't always revolve around sex. This could affect children's behaviour by potentially only seeing their future partners as objects to attain sex and not as individuals that are more than sex.’ – Boy, 20, survey, first saw pornography at age 13.

‘Pornography at its core is inherently misogynistic/ racist/discriminatory with very explicit categories of women. A child/young person watching isn't mature enough to understand that and could think that it's

¹ <https://www.covenanteyes.com/pornstats/>

² https://www.ofcom.org.uk/__data/assets/pdf_file/0013/220414/online-nation-2021-report.pdf

³ <https://www.theguardian.com/culture/2014/aug/20/teenagers-internet-pornography-damaging-poll>

⁴ <https://assets.childrenscommissioner.gov.uk/wpuploads/2023/07/CCO-Pornography-and-Young-People-1.pdf>

desirable to act like men in pornography or treat people like the women in pornography.’ - Girl, 21, survey, first saw pornography at age 8.

Therefore, there is evidence to suggest that public attitudes towards pornography are increasingly negative.

3. What evidence can you provide on how legal pornography adversely affects the behaviours of viewers? This can include relationships, psychological impacts and/or sexual behaviours of viewers.

It is worth first pausing to consider whether consumption of pornography ought to be considered normal behaviour in the first place. We, rightly, still have laws against voyeurism in the UK, but if it is filmed consensually, we suddenly now consider it acceptable behaviour. There is a disconnect and inconsistency with reality. So, whilst pornography use is very common, we ought to first realise that pornography use is itself an adverse and deviant behaviour that sadly has become normalised.

It is widely understood that marital infidelity causes damage to relationships. In the Christian worldview, pornography use is itself a form of unfaithfulness and therefore the difficulties that marital infidelity causes would be expected to be seen in relationships where one or both partners are using pornography. Famously, the Seventh Commandment is “you shall not commit adultery” (Exodus 20:14). Christians believe that disobedience to God’s commands will have negative consequences. There is evidence to support this.

Fight The New Drug⁵ has collated research on the effects of pornography on the behaviours of viewers. In their analysis of studies they have found that porn can:

- become an escalating behaviour⁶
- change the brain⁷
- contribute to an unhealthy cycle of stress⁸
- negatively impact relationships and intimacy⁹
- negatively impact sexual intimacy in relationships¹⁰
- negatively affects mental health¹¹
- fuel sex trafficking¹²
- promote sexual violence¹³

Maddox et. al (2011) shows that pornography use can lead to: a deterioration in communication with a pornography user’s partner, less motivation to maintain the relationship, a decrease in relational agreeability, less sexual satisfaction in the relationship, and an increase likelihood of unfaithfulness to the partner. Carroll et. al (2011) found that pornography use was negatively correlated with trust in

⁵ <https://fightthenewdrug.org/get-the-facts/>

⁶ <https://fightthenewdrug.org/how-porn-can-become-an-escalating-behavior/>

⁷ <https://fightthenewdrug.org/how-porn-can-change-the-brain/>

⁸ <https://fightthenewdrug.org/how-porn-can-contribute-to-an-unhealthy-cycle-of-stress/>

⁹ <https://fightthenewdrug.org/how-porn-can-negatively-impact-love-and-intimacy/>

¹⁰ <https://fightthenewdrug.org/how-porn-can-harm-consumers-sex-lives/>

¹¹ <https://fightthenewdrug.org/how-porn-can-impact-mental-health-and-fuel-loneliness/>

¹² <https://fightthenewdrug.org/how-porn-can-fuel-sex-trafficking/>

¹³ <https://fightthenewdrug.org/how-porn-can-promote-sexual-violence/>

relationships. Perry (2017) concluded that pornography use was the second strongest indicator that a marriage would deteriorate.

Given the various studies and surveys that indicate that many porn users consider pornography to be a realistic depiction of sex, it is unsurprising that legal pornography affects the sexual behaviours of viewers. For example the Children's Commissioner report "Pornography and Young People"¹⁴ found that "Young people aged 16-21 are more likely to assume that girls expect or enjoy sex involving physical aggression, such as airway restriction and slapping, than don't. Among respondents, 47% stated that girls 'expect' sex to involve physical aggression, a further 42% stated that most girls 'enjoy' acts of sexual aggression." Rothman et. al (2015) found that many young people seek to imitate what they have seen in porn and that the pressure to do such acts (even if painful or degrading) was correlated with other signs of an unhealthy relationship.

Laier et al. (2013) showed how pornography use can slow down the working short-term memory.

Weaver et al. (2011) found that adult users of pornographic material reported worse mental and physical health compared to non-users of pornography.

Doornwaard et al. (2016) conducted a study comprised of 331 Dutch boys and determined that compulsive pornography consumption correlated with higher levels of depressive feelings and lower self-esteem.

Persistent pornography can also have psychological impacts on the brain, causing changes to the brain leading to individuals forming addictive habits of pornography use. Kuhn and Gallinat (2014) found that pornography leads to an "intense stimulation of our reward system... [therefore making] pornography consumption more rewarding." This leads to pornography addiction.

A recent global study Bóthe et. al (2024) estimates that pornography addiction could be affecting 3% of the world's population, it estimated 2.3% in the UK. This study also found that those who struggled with porn addiction were, on average, exposed to porn at a younger age, 12 years old, than those not considered to have a porn addiction, 14 years old.

4. Is there evidence to suggest a link between viewing specific types of legal pornography (such as violent legal pornography) and subsequent attitudes towards relationships, psychological impacts and/or sexual behaviours of viewers?

Given the evidence outlined above, we believe it is correct to say *all* pornography has negative consequences on users' attitudes. For more extreme or deviant the pornography, the effect will be correspondingly stronger.

5. Is there evidence to suggest links between viewing specific types of pornography and viewers' attitudes towards violence against women and girls?

A study by Dignify¹⁵ found the average age of first exposure to porn was 12 years old. The effect of this early and consistent exposure has been seen in schools, where attitudes towards violence against women and girls has changed significantly. This was clearly seen in the shocking testimonies in the 'Everyone's Invited'¹⁶ initiative. As our Head of Education, Steve Beegoo, wrote at the time "*there is a vicious circle here. As pornography has become pervasive, so society 'must' teach young children about the dangers of pornography, so stirring thinking about such sexualising images in those as yet untainted by its toxicity. As*

¹⁴ <https://assets.childrenscommissioner.gov.uk/wpuploads/2023/07/CCO-Pornography-and-Young-People-1.pdf>

¹⁵ <https://dignify.org/>

¹⁶ <https://www.everyonesinvited.uk>

*unlawful under-age sexual activity has become acceptable, so teaching about 'safe sex' has become the emphasis in schools, and thereby stirring thoughts of sexual conduct in those unwilling, unprepared, and unready to even consider such activity."*¹⁷

The government's own review¹⁸ into sexual abuse in schools and colleges highlighted the scale of the problem, finding 90% of schoolgirls have received unsolicited sexual images and been subject to sexist name calling. In the Parliament publication "the scale and impact of sexual harassment and sexual violence in schools"¹⁹ it was found that:

- 59% of girls and young women aged 13–21 said in 2014 that they had faced some form of sexual harassment at school or college in the past year.
- Almost a third (29%) of 16–18-year-old girls say they have experienced unwanted sexual touching at school.
- 41% of UK girls aged 14 to 17 who reported an intimate relationship experienced some form of sexual violence from their partner.
- 22% of young girls aged 7–12 have experienced jokes of a sexual nature from boys.
- Nearly three-quarters (71%) of all 16–18-year-olds (boys and girls) say they hear sexual name-calling with terms such as "slut" or "slag" used towards girls at schools on a daily basis or a few times a week.
- 28% of 16–18-year-olds say they have seen sexual pictures on mobile phones at school a few times a month or more.

Noll et. al (2022) showed that there was a positive correlation between attitudes and use of pornography and beliefs in 'rape myths'.

The Children's Commissioners Report Pornography and Young People²⁰ states that "Young people aged 16-21 are more likely to assume that girls expect or enjoy sex involving physical aggression, such as airway restriction and slapping, than don't. Among respondents, 47% stated that girls 'expect' sex to involve physical aggression, a further 42% stated that most girls 'enjoy' acts of sexual aggression."

Cikara et. al (2011) found how pornography can lead to the objectification of women. They wrote that "sexualized women were perceived as having the least control over their own lives... this suggests that sexualized women are more closely associated with being the objects, not the agents, of action as compared to clothed women."

Foubert et. al (2011) found that porn users were more likely to express an intent to rape and less likely to intervene during a sexual assault, more like to victim-blame female survivors of sexual assault.

We also recommend John Foubert's book *How Pornography Harms* (LifeRichPublishing: 2017). He cites 100 studies that correlate pornography use with a wide range of violent behaviours, and nearly 50 studies that show a correlation between pornography and sexual violence. Kingston et al. (2009) in a meta-

¹⁷ <https://christianconcern.com/comment/rape-culture-in-schools-curriculum-or-parents-to-blame/>

¹⁸ <https://www.gov.uk/government/publications/review-of-sexual-abuse-in-schools-and-colleges/review-of-sexual-abuse-in-schools-and-colleges>

¹⁹ https://publications.parliament.uk/pa/cm201617/cmselect/cmwomeq/91/9105.htm#_idTextAnchor009

²⁰ <https://assets.childrenscommissioner.gov.uk/wpuploads/2023/07/CCO-Pornography-and-Young-People-1.pdf>

analysis found that pornography use specifically is correlated with increased likelihood that a man will commit acts of sexual violence against women.

Four studies, [Wright et. al (2016), Rostad et. al (2019), Goodson et. al (2019), Mikorski & Szymanski (2017)] have found evidence that pornography users are more likely to commit actual acts of sexual violence. Wright et. al (2016) concluded there is “little doubt that, on the average, individuals who consume pornography more frequently are more likely to hold attitudes conducive to sexual aggression and engage in actual acts of sexual aggression.”

Peter et. al (2007) found that the younger males and females viewed porn, the more they took on a mindset that objectified females.

6. What evidence can you provide to show the prevalence of users who view legal pornography, and then go on to view illegal pornography or child sexual exploitation and abuse material (either deliberately or inadvertently)? Please make clear whether evidence included refers to material watched deliberately or inadvertently.

Child abuse expert Michael Sheath, former principal practitioner at Lucy Faithfull Foundation, has said that “Mainstream pornography sites are changing the thresholds of what is normal and I think it’s dangerous... What we are seeing on a daily basis is the conflation of easy access to hardcore and deviant pornography and an interest in child molestation. The link is unambiguous.” He went on “My earliest clients were child molesters. They tended to have been beaten, abused or have some sort of dysfunction. I’ve found in the last 10 years that increasingly people who view child sex abuse material don’t seem to have that history. They are mundane, ordinary people from all walks of life.”²¹ Whilst this is anecdotal evidence from his own practice, he is seeing legal pornography being a gateway towards deliberate viewing of illegal pornography.

The Dutch organisation “Nationaal Rapporteur Mensenhandel en Seksueel Geweld tegen Kinderen”²² (National Reporting on Human trafficking and Sexual Violence against Children), published a study of young perpetrators (and potential perpetrators) of online child sexual abuse. They found that half of “young viewers of child sexual abuse images describe risky porn viewing behavior or an escalation in it.” (translated from Dutch) Kelly van den Heuvel, one of the researchers said “These young people end up in a downward spiral due to repeated exposure to pornographic images. They seek increasingly extreme images to experience the same level of tension and excitement.” (translated from Dutch)

Whilst these two sources don’t describe the prevalence of those who go on to view illegal pornography, it does show that for those who do view illegal pornography, watching legal pornography was the starting point for them.

7. What evidence can you provide on the proportion of UK citizens that have intentionally or unintentionally viewed illegal pornography online? Please make clear whether evidence included refers to intentional or unintentional viewing.

There is limited evidence of the proportion. Given the evidence that illegal pornography is often present on mainstream websites, we can expect the proportion that unintentionally view illegal porn online to be high.

²¹ <https://www.theguardian.com/global-development/2020/dec/15/how-extreme-porn-has-become-a-gateway-drug-into-child-abuse>

²² <https://www.nationaalrapporteur.nl/publicaties/rapporten/2023/08/24/maak-het-bespreekbaar>

The 2022/2023 report²³ by Stop It Now!, an initiative of the Lucy Faithfull Foundation, reported that they had helped 8,614 people who had reached out for help regarding viewing child pornography. This number has been steadily increasing since the service was launched in 2002.

8. What evidence can you provide on the prevalence of child sexual abuse and exploitation content appearing on pornography sites?

Bridges et. al (2010), in a survey of popular porn videos, found that 88.2% of porn videos contained physical violence or aggression.

It has been reported that content on pornographic websites is often not reliably legal or absent of child sexual exploitation / abuse material. Most prominently was Nicholas Kristof's article "Children of Pornhub"²⁴ in the New York Times published in December 2020. He quoted women who had exploitative (and illegal) pornographic content of them uploaded to Pornhub. For example, he writes: "After a 15-year-old girl went missing in Florida, her mother found her on Pornhub — in 58 sex videos."

The outcry from the article, and the campaign from the organisation Exodus Cry²⁵ which is seeking justice for women and girls who have been exploited, led to Pornhub deleting 80% of the content on their site overnight, about 10 million videos.

Madison McQueen and Olivia Burnett have highlighted the connections between pornography and trafficking²⁶, additionally it is reported in Farley (2007), in interviews with 854 women in prostitution in 9 countries, that 49% of the women in the survey were forced to make pornography whilst enslaved in sex trafficking.

9. What evidence can you provide on how illegal pornography affects the behaviours of viewers? This can include relationships, psychological impacts and/or sexual behaviours of viewers.

Given the evidence of adverse affects of *legal* pornography on the behaviours of viewers, it is reasonable to extrapolate and assume that the more deviant or extreme the pornography, the more damaging it will be to the viewer.

10. The Review is seeking to understand what might lead a person to view illegal pornography or child sexual exploitation and abuse material. What evidence can you provide of legal pornography viewing habits that might lead a person to deliberately view:

10.1 illegal pornography; or

10.2 child sexual exploitation and abuse material?

We will answer 10.1 and 10.2 together.

Christians believe that persistent sin and disobedience to God's law can have a hardening effect on one's own conscience. 1 Timothy 4:2 describes individuals who have a *seared conscience*, and Romans 1 describes how God will hand rebellious people over to their own desires (i.e. God will loosen his restraint on evil). Part of this is a natural consequence to forming unhealthy habits.

There is evidence to suggest that persistent pornography use can cause desensitisation, where more exciting pornography is needed to result in the same dopamine experience. Porn users will look for

²³ www.lucyfaithfull.org.uk/files/LFF_Annual_Report_2022-2023_FINAL.pdf

²⁴ <https://www.nytimes.com/2020/12/04/opinion/sunday/pornhub-rape-trafficking.html>

²⁵ <https://www.exoduscry.com>

²⁶ <https://exoduscry.com/articles/porn-and-trafficking/>

novelty and this may be found in new types of pornography. Dr Norman Doidge, a psychiatrist, writes in “The Brain That Changes Itself” that “*Pornography satisfies every one of the prerequisites for neuroplastic change. When pornographers boast that they are pushing the envelope by introducing new, harder themes, what they don’t say is that they must, because their customers are building up a tolerance to the content.*”²⁷

Further, the desire for novelty and excitement can lead to viewing different types of pornography. Park et. al (2016) found 49% of respondents “*mentioned at least sometimes searching for sexual content or being involved in [Online Sexual Activity] that were previously not interesting to them or that they considered disgusting.*”

Elisha Kolade, in his autobiography “The Cry for Freedom: The Story of a Porn Addict”, writes how his addiction to pornography led to evermore extreme pornography use, including homosexual pornography, and use of prostitutes.

In the Children’s Commissioners Report “Pornography and Young People” it was found that “early exposure to pornography and frequent consumption of pornography significantly increase the likelihood of encountering sexually violent content.”²⁸

As quoted above in Q 6, Child abuse expert Michael Sheath, former principal practitioner at the Lucy Faithfull Foundation, has said that “Mainstream pornography sites are changing the thresholds of what is normal and I think it’s dangerous... What we are seeing on a daily basis is the conflation of easy access to hardcore and deviant pornography and an interest in child molestation. The link is unambiguous.” He went on “My earliest clients were child molesters. They tended to have been beaten, abused or have some sort of dysfunction. I’ve found in the last 10 years that increasingly people who view child sex abuse material don’t seem to have that history. They are mundane, ordinary people from all walks of life.”²⁹

11. What evidence can you provide of legal pornography viewing habits that might lead a person to inadvertently view:

11.1 illegal pornography; or

11.2 child sexual exploitation and abuse material?

We will answer 11.1 and 11.2 together.

Given the prevalence of illegal pornography and child sexual exploitation and abuse material on pornographic websites (as outlined in Q8), it is likely that users of pornography will inadvertently view such content.

14. What evidence can you provide on the positive or negative impacts of AI-generated pornography on viewers? This can include the impact on relationships, psychological impacts and/or sexual behaviours.

We believe the existence of AI-generated pornography will have a large negative impact on viewers. AI-generated pornography will go further in normalising an unreality. As noted above, it is already clear that many believe that pornography is “real” and that what is viewed is to be expected in real life. This problem will be heightened by AI-generated pornography.

²⁷ <https://neurosciencenews.com/neuroscience-pornography-brain-15354/>

²⁸ <https://assets.childrenscommissioner.gov.uk/wpuploads/2023/07/CCO-Pornography-and-Young-People-1.pdf>

²⁹ <https://www.theguardian.com/global-development/2020/dec/15/how-extreme-porn-has-become-a-gateway-drug-into-child-abuse>

16. What evidence can you provide on the impacts of AI-generated pornography, where the subject has not necessarily consented to their image/ likeness/ voice being used?

The Internet Watch Foundation has found that “AI CSAM has increased the potential for the re-victimisation of known child sexual abuse victims, as well as for the victimisation of famous children and children known to perpetrators. The IWF has found many examples of AI-generated images featuring known victims and famous children.”³⁰

A recent New York Times article documents the story of several middle school aged pupils who made and distributed fake nude photos of their peers.³¹ Whilst the forwarding of “sexts” without consent is already common, this heightens the sense of bullying and pain by creating images in the first place without the pupil’s consent.

17. Does AI-generated pornography present a different type of harm, compared to non-AI-generated pornography? The harm can refer to both the viewer as well as societal attitudes towards sex and relationships. Please provide any evidence to support this.

One of the issues of pornography, which we have mentioned above, is its disconnect from reality and the distorting of sexual expectations on partners. This would be accelerated with AI-generated pornography where, given how real AI-generated imagery can look, even more distorted and unreal material will be available for consumption. Pornography and sexual behaviours that have not even been thought of might well become available to watch.

18. What evidence can you provide on the positive and/ or negative impacts of augmented reality or virtual reality-generated pornography on viewers? This can include the impact on relationships, mental health and/or sexual behaviours.

Augmented reality or virtual reality-generated pornography will have a greater negative impact on viewers. The perceived active involvement of the viewer could heighten the sense of excitement and arousal, leading to an even greater disconnect from reality. Evans (2011) found “VR pornography appears, on the basis of limited research, to increase sexual arousal with regard to the reaction of people to pornography. Studies that have compared 2D pornography to VR pornography have identified increased subjective and objective levels of arousal in participants for VR pornography.” Further “The use of VR pornography could have effects on addiction to pornography and associated behaviours thanks to increased stimulation.”

Orel (2020) wrote that “as VR can be determined by the sense of being in a different reality setting, shifting pornographic content into a simulated digital environment could open a variety of possibilities for those who seek not only pleasure, but also complete freedom of sexual expression, the fulfilment of sexual desires, and the chance of simultaneously gaining public visibility as a result of their actions.”

Wood et. al (2017) found a correlation between individuals who use VR environments and behaviour that crosses societal boundaries and which they would not otherwise experience in real life. Isanejad and Bagheri (2018) found in a study on marital satisfaction, loneliness, internet infidelity, and the digital world shows that loneliness has a positive correlation with online infidelity.

³⁰ <https://www.iwf.org.uk/about-us/why-we-exist/our-research/how-ai-is-being-abused-to-create-child-sexual-abuse-imagery/>

³¹ <https://www.nytimes.com/2024/03/02/opinion/deepfakes-teenagers.html>

This will particularly affect relationships where a partner's use of augmented reality or virtual reality-generated pornography will, to the viewer, be closer to actual adultery (actual in the sense of a real physical sexual interaction with another person).

19. What impact has pornography's shift to online mediums had on viewers? This could include impacts on accessibility, attitudes, violence against women and girls etc. Please provide evidence to support this.

The title of the 2013 Children's Commissioner project report, Horvath et. al (2013), sums up the impact: "Basically... porn is everywhere."

The rise of the smartphone has rapidly increased the accessibility and usage of pornography. A 2023 French study published in ARCOM, quoted by the European Centre for Law & Justice (ECLJ)³² found that 2.3 million children visit pornographic websites each month, an increase of 36% in 5 years and that "The mobile phone is the most commonly used device, regardless of age. For 75% of minors, the mobile is even the exclusive terminal" for accessing porn websites. In 2023, 91.3% of all traffic to Pornhub³³ was via a smartphone.

There is plenty of evidence to show that the age of first exposure to pornography is getting lower and that this is driven by smartphones. The same ECLJ article linked above quotes another Polish study that showed that "young people questioned most often stated that they had seen pornography for the first time using a smartphone/phone with Internet access (35.1%), and that it was this type of device that was used most often to access this content for 76.2% of the 16-year-olds questioned and 66.9% of 12-14-year-olds."

We believe that because the shift to online mediums has increased the accessibility and use of pornography it has led to increased prevalence of the adverse effects described in Questions 3, 5 and 8 above.

Additionally, those adverse effects would be greater for young people and children because of their stage of development. The Campaign to End All Sexual Exploitation UK (CEASE UK) have outlined the specific adverse effects that porn has on children.³⁴ Consequently, the adverse effects are even greater because not only are individuals consuming more porn than ever before, they are consuming it at a younger age than ever before.

20. Are performers appearing in pornographic content receiving adequate protections from harm in the industry? Please provide any evidence to support this.

There is evidence of widespread abuse and exploitation in the pornographic industry. Madison McQueen and Olivia Burnett document a number of the stories of exploitation and trafficking in an article titled "How Porn and Trafficking Are Undeniably Connected."³⁵ In another article, Madison McQueen documents that "In 2016, 22 women testified to being manipulated and tricked by producers into making internet pornography for a website called GirlsDoPorn from 2009 to 2020."³⁶

³² <https://eclj.org/family/eu/jeunes-smartphone-et-porno-un-cocktail-dangereux> [accessed 29/02/2024]

³³ <https://www.pornhub.com/insights/2023-year-in-review#traffic>

³⁴ <https://cease.org.uk/facts/pornography/how-porn-hurts-children/>

³⁵ <https://exoduscry.com/articles/porn-and-trafficking/>

³⁶ <https://exoduscry.com/articles/here-are-the-biggest-cases-of-trafficking-in-porn/>

CEASE UK highlight the damage that is done to women in the porn industry, they write “The testimonies of women who have left pornography build a picture of an industry culture rife with coercion, exploitation and abuse.”³⁷

³⁷ <https://cease.org.uk/facts/pornography/shattering-the-porn-star-fantasy/>

Comparing the Regulation of Pornographic Content accessed via physical media, broadcast or video-on-demand, against the regulation of Online Pornographic Content accessed via Commercial Pornography Websites and User-to-user Sites

21. What evidence can you provide on the number of people watching pornography:

21.1 online (via a dedicated pornography website or social media); or

OFCOM's 2023 Report³⁸ found that 29% of UK online adults accessed a pornographic website in May 2023. 73% of those adults were men. Strikingly, the most common time to access a pornographic website was between 9am and 5:30pm. Unfortunately, OFCOM do not publish – or collect – statistics of UK children access pornographic websites.

A study by Dignify³⁹ surveyed 4,000 children between the ages of 14 and 18 in Hertfordshire. It found that 40% of students have viewed porn, 22% of students had viewed porn on multiple occasions. Of those, one in five said they had a porn habit and one in 10 said they felt addicted. In the survey, the average age of first exposure to porn was 12 years old.

22. Please provide any evidence that shows there are different impacts on viewers who view pornographic content on social media and/or dedicated pornography websites, compared to viewing pornography on a physical medium (such as physical pornography videos)?

Pornography use on a website, and generally viewed on a phone, combines the problems of pornography with the problems associated with excessive screen/phone usage. In Dr Victoria Dunckley MD's book *Reset Your Child's Brain* (New World Library, 2015), she finds that excessive time on screens can create subtle changes in the cardiovascular system, which can cause significant damage over the course of time. She calls this Metabolic syndrome, which is a combination of the following: high blood pressure, midsection weight gain, abnormal cholesterol levels, high fasting blood sugar. Lissak (2018) found that excessive and addictive use of digital media is associated "with poor sleep and risk factors for cardiovascular diseases such as high blood pressure, obesity, low HDL cholesterol, poor stress regulation (high sympathetic arousal and cortisol dysregulation), and Insulin Resistance. Other physical health consequences include impaired vision and reduced bone density. Psychological effects: internalizing and externalizing behavior is related to poor sleep. Depressive symptoms and suicidal are associated to screen time induced poor sleep, digital device night use, and mobile phone dependency."

Whilst this study was not directly focussed on pornography, it is reasonable to conclude that, given the addictive nature of pornography and its particular accessibility through smartphones, that these dangers interact with each other.

23. What evidence can you provide on the effectiveness of the existing regulatory regimes for pornographic content (illegal and legal- see section 2.1)? This can include online content, video-on-demand, broadcasting, advertising, and physical media.

³⁸ https://www.ofcom.org.uk/__data/assets/pdf_file/0029/272288/online-nation-2023-report.pdf

³⁹ <https://dignify.org/>

Given widespread accessibility and use of pornography amongst children, it is obvious that current regulation is not protecting those who are most harmed and vulnerable to pornography from being able to access it.

Furthermore, the reports of illegal, coercive, and/or underage pornography being hosted on porn websites (as document in the New York Times' Children of Pornhub article mentioned above), there is clearly ineffectiveness in regulating the content of porn that is uploaded onto websites.

24. Are there likely to be any unintended consequences of further regulatory alignment? Please provide any evidence you have to support this.

Any concerns about unintended consequences would likely be flagged by those who are profiting off pornography.

25. Considering pornography's regulatory landscape, including the not yet fully inforce regulations on user-to-user platforms and pornography publishers through the Online Safety Act 2023 (see section 2.1, paragraph 30),

do you think there are:

25.1 any gaps in the regulation of online pornography? Please provide evidence and detail any reasoning;

In the Call for Evidence it is stated that "content should be considered "obscene" if it has the tendency to deprave or corrupt those likely to read, see or hear the material." We believe this definition should extend to all pornography. The regulatory environment should create a culture that normalises that all pornography is harmful and damaging not just to children, but to adults too. Given the widely known harms of pornography to individuals and society, we believe that pornography should not be freely available to individuals. Like efforts to reduce smoking use, we believe that proposals should be made to actively reduce the consumption of pornography amongst adults, as well as children.

We would recommend:

- Laws against the production and distribution, including online, of pornographic images and videos, which is common in many non-Western nations. We believe this would have a significant impact on the consumption of porn in the UK. We would not recommend legislation which restricts the use of VPNs.
- Laws to financially disincentivise production and consumption of pornography
- Mandatory health warnings on pornography websites and videos.
- Use of 'nudge' policies on all online pornography
- A full ban on broadcasting of Pornography, including video on demand.

To protect against the normalising of sexual violence, we believe that the standard given to R-18 movies by the BBFC should be applied to online material as well. Specifically, we believe the following material should be illegal:

- material (including dialogue) likely to encourage an interest in sexually abusive activity which may include adults role-playing as non-adults;

- the portrayal of sexual activity which involves real or apparent lack of consent. Any form of physical restraint which prevents participants from indicating a withdrawal of consent;
- the infliction of pain or acts which are likely to cause serious physical harm, whether real or (in a sexual context) simulated.
- penetration by any object likely to cause physical harm;
- sexual threats, humiliation or abuse.

Regarding proposals to protect children from accessing pornography, and protecting illegal or non-consensual material being uploaded, we support the three policy recommendations proposed by CEASE UK.⁴⁰

Firstly, that age-verification for all pornographic websites be brought in immediately.

Secondly, regulation that ensures pornography websites either remove user generated content (UGC) functionality or implement robust age and consent verification processes to ensure that all those featured in video uploads are consenting adults.

Thirdly, and aware that this has been partially achieved in the Online Safety Bill, classify pornography websites as providers of Category 1 services, introduce relevant Codes of Practice and designate a specific regulator to ensure compliance. Porn websites must be made to stop hosting illegal “extreme” pornography and the “legal but harmful” content prohibited by its own terms of service. We believe sanctions should be in place for porn websites that do not have the effective and robust checks in place as suggested in the draft OFCOM guidance.

We believe that pornographic websites that do not effectively stop young people from accessing their website should be liable to criminal sanction and subject to an unlimited fine.

or 25.2 any gaps in regulation of offline pornography? Please provide evidence and detail any reasoning.

As we suggested in Q25.1, the regulatory environment should create a culture that normalises that pornography is harmful and damaging not just to children, but to adults too. Given the widely known harms of pornography to individuals and society, we believe that pornography should not be freely available to individuals. Like efforts to reduce smoking use, we believe that proposals should be made to actively reduce the consumption of pornography amongst adults, as well as children.

A simple way to do this for offline pornography is a ban on the production and sale of pornography in the UK. This would include removing licenses of sex shops and cinemas that show R-18 Material.

⁴⁰ <https://cease.org.uk/expose-big-porn/>

The Response to Illegal Pornographic Content and Exploitation and Abuse in the Pornography Industry

27. In your view, how can the criminal justice system’s response to tackling illegal pornographic content be strengthened?

The same protection for women against pimping should extend to pornography in order to protect women from exploitation in pornography.

We believe the Sexual Offences Act Section 54 (2), the definition of “prostitute” should explicitly include pornography workers. Currently the definition is “*“prostitute” means a person (A) who, on at least one occasion and whether or not compelled to do so, offers or provides sexual services to another person in return for payment or a promise of payment to A or a third person; and “prostitution” is to be interpreted accordingly.*” Which should, with that wording, apply to porn workers, but it is not interpreted that way currently.

We recommend therefore expanding the definition in order to tackle exploitation in pornography.

28. In your view, how is the current response by the criminal justice system impacting individuals' decisions to report on:

28.1 illegal pornography;

28.2 modern slavery/human trafficking in pornography; or

28.3 child sexual abuse and exploitation content that appears on pornography sites?

We will answer 28.1 – 28.3 together.

We believe that the delay in criminal action against porn websites for hosting illegal pornography has led to less individuals willing to come forward. The campaign Trafficking Hub, the New York Times article “the Children of Pornhub”, and subsequent media scrutiny, has done far more to raise awareness. There have not been any major reports of criminal action taken against pornography websites, and their owners, which could likely deter reporting on illegal pornography and other.

29. What evidence can you provide on efforts made by the pornography industry to tackle and combat the following appearing on their services:

29.1 illegal pornographic content; or

29.2 child sexual abuse and exploitation material?

We will answer 29.1 and 29.2 together.

CEASE UK in 2021 published a report “Expose Big Porn: Uncovering the online commercial pornography industry and the urgent need for regulation”⁴¹. This report highlights that unregulated porn websites and companies are doing little to nothing to tack and combat illegal pornographic content and/or child sexual abuse and exploitation material. In the report, CEASE UK documented the presence of illegal pornographic content on porn websites and the seeming reluctance for this to be addressed. Vanessa Morse, the-then CEO of CEASE UK, wrote in the foreword “*Make no mistake, the online porn industry is*

⁴¹ https://cease.org.uk/wp-content/uploads/2021/07/210607_CEASE_Expose_Big_Porn_Report.pdf

neither naive nor neutral. Free from oversight, it has monetised videos of rape, abuse and other non-consensual sex acts, failing victims and survivors who call for help. Always at the forefront of tech advancement, the porn industry has designed its sites to ensure that vast numbers of visitors stay for as long as possible and return again and again - even if they are children."

30. What evidence can you provide on the prevalence of modern slavery/human trafficking in the pornography industry?

TraffickingHub⁴², a campaign led by Exodus Cry, has exposed human trafficking in the pornography industry, documenting a number of testimonies, many of which were reported in the New York Times article "Children of Pornhub."

A 2023 Report, Pornography Production Harm in Sweden: Filmed Prostitution is Inseparable from Non-Filmed Prostitution found "evidence that pornography cannot be separated from prostitution or trafficking. We base our conclusion on 105 interviews of women and men in the sex trade - most of whose prostitution was photographed, videotaped, or livestreamed."⁴³

Naomi Miles, co-founder of CEASE UK, highlight the inherent connections between trafficking, prostitution and pornography in an article for Christian Concern.⁴⁴ She writes:

- Pornography directly fuels the demand for the sex trade and thus for sex trafficking, as more and more viewers want to act out in person what they see on screen.⁴⁵
- Pornography is integral to prostitution, with pornography images and videos often made as fringe "products" from victims being sold for sex.⁴⁶
- According to Farley (2011), the same factors of vulnerability apply to women in the porn industry as to women in prostitution. And as with prostitution, the act of performing in pornography causes serious physical and psychological damage, Corita et. al (2008).

31. What evidence can you provide on the efforts made by the pornography industry to track and counter instances of modern slavery/human trafficking?

We are not aware of any evidence of efforts made by the pornography industry to track and counter instances of modern slavery/human trafficking.

32. How has the increase in online pornography and ease of access, positively and/ or negatively impacted adult performers? Please provide evidence to support this.

The scale of online pornography has led to increased exploitation of 'adult performers.' It is well documented in, for example the Netflix documentary "Hot Girls Wanted"⁴⁷ how the increased in demand for porn, catalysed by the spread of online pornography, has damaged and harmed women. The culture in the 90s and 00s of 'porn stars' who were paid lots of money and sometimes had reasonably lengthy careers has been hit by online pornography. Louis Theroux documented some of the changes in a BBC documentary "Twilight of the Pornstars" which was broadcast in 2012. In a Guardian article titled 'how internet killed porn' promoting the documentary Theroux writes "The arrival of free YouTube-style porn sites meant that consumers could download pirated scenes from the vast backlog of old content for free.

⁴² <https://traffickinghub.com/>

⁴³ <https://prostitutionresearch.com/wp-content/uploads/2023/10/PornographyProduction-Harm-Cover-merged.pdf>

⁴⁴ <https://christianconcern.com/comment/trafficking-prostitution-and-pornography-the-inherent-connections/>

⁴⁵ <https://fightthenewdrug.org/how-porn-can-fuel-sex-trafficking/>

⁴⁶ <https://fightthenewdrug.org/survivor-story-sex-trafficking-nightmare-ties-to-porn/>

⁴⁷ <https://www.netflix.com/gb/title/80038162>

... And as goes the industry, so go the performers. It's well known that many of them come into porn looking for validation, fleeing lives of damage and abuse. They then sign up to a lifestyle that inflicts stress and illness, not to mention embarrassment, on its young foot soldiers, while offering nothing in the way of pensions and health insurance. Now they find themselves out of work, looking for a Plan B, when the only experience on their resumé is having sex for cash.”⁴⁸

It is worth noting that porn work was always inherently toxic. The shift to online pornography has simply further exposed the vulnerability and fleeting nature of porn work.

33. What evidence can you provide on the effectiveness of specific measures, in diverting viewers from accessing illegal pornographic content online? For example, nudge tactics (design features which encourage, or ‘nudge’, users to make a different decision)

A report published in February 2024 “reThink Chatbot Evaluation”⁴⁹ which evaluated an 18-month study of the effectiveness of a chatbot operating on Pornhub to discourage possible searches for Child Sexual Abuse. The report said “There is a statistically significant trend showing a decrease in the number of searches for CSAM material on Pornhub in the UK during the length of the intervention. There are indications that the warning message and chatbot reduced the total number of searches for CSAM material on Pornhub; most sessions which triggered the warning and chatbot once do not appear to have searched for CSAM again and those who see the warning message more than once, tend to undertake non-CSAM searches after receiving the warning.”

This implies ‘nudge’ policies, particularly when coupled with innovative technology, can be effective.

We believe nudge measures should be used to divert viewers away from accessing legal pornographic content as well.

⁴⁸ <https://www.theguardian.com/culture/2012/jun/05/how-internet-killed-porn>

⁴⁹ https://www.lucyfaithfull.org.uk/files/reThink_Chatbot_Evaluation_Report.pdf

Education and Information Resources on Pornography

34. What education / information are you aware of being available for adults about:

34.1 the potential impact of viewing pornography? This can include some types of legal pornography which convey violent or misogynistic assumptions about sex and relationships.

There are a number of excellent ministries that educate and share information about the impact of pornography.

We at Christian Concern hosted a conference in 2020 about the harms of pornography. The resources from that conference are available online.⁵⁰

The Naked Truth Project⁵¹ exists to “to open eyes & free lives from the damaging impact of pornography through awareness, education and recovery programmes.” They published the book “Confronting Porn” by Paula Hall, which “offers a biblical, professional and practical approach to the issue of porn, offering hope and support for individuals struggling with porn and those who want to help them.”⁵²

Fight the New Drug⁵³ exists to “to raise awareness on the harmful effects of porn using only science, facts, and personal accounts.”

Dignify⁵⁴ exists to “challenge the normalising of pornography, particularly its harmful effects on children and young people.”

34.1.1 In your view, how effective is this education / information?

The education and resources above are helpful in providing a framework to understand the effects of pornography. As Christians, we believe that opposition to pornography must be framed in a wider promotion of a Christian understanding of sex and relationships. Since we believe sexual immorality (Greek: porneia) is sin, we believe any resource, education, or information that suggests that pornography use is *sometimes* acceptable is inherently unhelpful and counter-productive.

Any education / information about pornography, in order to be effective, must have a zero-tolerance approach to porn use. All of the above resources affirm that. It is worth noting that, whilst societal views on pornography are mixed, this highlights an inconsistency in the values in our culture today, which encourages individuals to “be true to yourself”, “do whatever you want”, “don’t let others tell you what to do” etc. A consistent Christian ethic sees the dangers and harms of pornography not just because of the data, but because of the devaluation and objectification of women that is inherent in pornography. Christians have a far more beautiful sexual ethic than the culture today and we believe any effective education or information should be pointing people towards that better vision.

Because of all the dangers and addictiveness of pornography, there will be inherent weaknesses in anything which seeks to simply educate someone out of porn use. Part of the power of porn is that, even when people know it is wrong and unhealthy, they still return to use it.

34.2 what constitutes illegal pornography?

⁵⁰ <https://christianconcern.com/resource/champion-sexual-purity-with-our-pure-resources/>

⁵¹ <https://nakedtruthproject.com/about/>

⁵² <https://nakedtruthproject.com/shop/confronting-porn-by-paula-hall/>

⁵³ <https://fightthenewdrug.org>

⁵⁴ <https://dignify.org/about-us>

It is well known that child pornography is illegal, possibly more due to societal awareness of the law on paedophilia than education about illegal pornography.

We are not aware of evidence that shows the knowledge of the legality of material deemed 'obscene' and is illegal, for example bestiality.

34.2.1 In your view, how effective is this education / information?

It is well known that child pornography is illegal, possibly more due to societal awareness of the law on paedophilia than education about illegal pornography.

We are not aware of evidence that shows the knowledge of the legality of material deemed 'obscene' and is illegal, for example bestiality.

35. What education / information are you aware of being available for children about:

35.1 the impact of viewing pornography? This can include some types of legal pornography which conveys violent or misogynistic assumptions about sex and relationships.

The organisation *Faith in Kids* has a number of good resources for parents⁵⁵ in talking about pornography with their children.⁵⁶

Sexologist, Patricia Weerakoon has written a series of books for children and teenagers about sex and relationships, including one on pornography.⁵⁷

Lovewise, a charity which seeks to help parents, youth groups and schools by providing presentations on the subjects of marriage, sex and relationships⁵⁸ from a Christian perspective has helpful resources for parents too on pornography.⁵⁹

Alive to the World helps children and young people grow in emotional intelligence and grow in maturity and wisdom particularly in relationships and sex education.⁶⁰

The Message Trust, a ministry supporting teenagers live out their Christian faith, produced a video looking at some of the dangers of pornography.⁶¹

35.1.1 In your view, how effective is this education / information?

We believe the above are helpful resources, particularly for parents, in supporting their children in navigating pornography.

35.2 what constitutes illegal pornography?

School children are told often that 'sexting' is illegal.

We are not aware of education/information that highlights what is considered 'obscene' in the Law, though education needs to be careful not to have the effect of raising awareness of the existence of such pornography.

⁵⁵ <https://www.faithinkids.org/why-partner-with-parents-to-talk-about-identity/>

⁵⁶ <https://www.faithinkids.org/lets-talk-about-sex/>

⁵⁷ <https://youthworksmmedia.co.uk/products/birds-and-bees-by-the-book>

⁵⁸ <https://lovewise.org.uk/christian-parents-sex-education/>

⁵⁹ <https://lovewise.org.uk/pornography-dangers-and-decisions.html>

⁶⁰ <https://alivetotheworld.co.uk/pornography/>

⁶¹ https://www.youtube.com/watch?v=EetSKLXd-zs&list=PLBZCpUBB77YR8HoQp-MJjUlUowFgs8_j&index=19

35.2.1 In your view, how effective is this education / information?

It is well known that child pornography is illegal, possibly more due to societal awareness of the law on paedophilia than education about illegal pornography.

We are not aware of evidence that shows the prevalence of knowledge or understanding of the legality of material deemed 'obscene' and is illegal, for example bestiality.

Internet Matters state that sexting is "prevalent among those aged 15 and over, with 17% saying they had shared a nude or sexual photo of themselves. This increases in the mid-teens, from 4% at age 13 to 7% at age 14. The rate then more than doubles between the 14 and 15+ age groups, when around 1 in 6 have sent an image of themselves to someone else."⁶² Given the prevalence of "sexting" it seems education/information about it is not effective.

36. What evidence can you provide on what motivates children, parents and carers to seek information about pornography and its harmful impacts?

Parents should want the best for their children. For Christians, who are generally against any and all pornography use, there is a desire for parents, who are given the primary responsibility for the nurturing, protection and teaching of teaching, to raise boys and girls to have a healthy Christian understanding of sex and relationships.

Whilst evidence, outlined above, shows that porn can negatively shape users' attitudes towards women, Christians believe porn use *itself* is negative *behaviour* towards women. Therefore, parents generally desire purity for their children.

37. In your view, how could parents / carers be better supported to educate their children about pornography? Please provide any evidence you have to support this.

The resources and ministries mentioned in Q 35 should be supported and shared with parents. Because of the clash of worldviews and values in our society today, it is harder to support parents. A shared common ethic that pornography is: always wrong, damaging to individuals and to society, and harms women, would help de-normalise pornography use. If there were shared values that pornography is wrong, that would help build consensus in schools and society. The government should be proactive in tackling pornography and take a zero-tolerance approach.

38. In your view, what information or support would be helpful for adults who are concerned about their own consumption of pornography? Please provide any evidence you have to support this.

Christians often make use of accountability software, such as Covenant Eyes⁶³ and Ever Accountable⁶⁴, which allows individuals struggling with porn to give access to their browser history to a friend or pastor, who can keep them accountable.

The Naked Truth Project⁶⁵ exists to "to open eyes & free lives from the damaging impact of pornography through awareness, education and recovery programmes." They published the book "Confronting Porn" by Paula Hall, which "offers a biblical, professional and practical approach to the issue of porn, offering hope and support for individuals struggling with porn and those who want to help them."⁶⁶

⁶² <https://www.internetmatters.org/issues/sexting/learn-about-sexting/>

⁶³ <https://www.covenanteyes.com/>

⁶⁴ <https://everaccountable.com/>

⁶⁵ <https://nakedtruthproject.com/about/>

⁶⁶ <https://nakedtruthproject.com/shop/confronting-porn-by-paula-hall/>

Lifestar Network exists to “to bringing hope, healing, and recovery to individuals, families, and spouses affected by unwanted compulsive sexual behaviors and the powerful grips of sex addiction.”⁶⁷

Integrity Restored exists to “help restore the integrity of individuals, spouses, and families that have been affected by pornography and pornography addiction.”⁶⁸

Real Battle Ministries exists to educate, encourage and support those affected by pornography.⁶⁹

John Foubert’s book *How Pornography Harms* (LifeRichPublishing: 2017) is a more detailed overview of the damage of pornography, though is less accessible.

Ray Ortlund’s book *The Death of Porn* (Crossway: 2021) seeks to inspire men to come together in new ways to fight the injustice of porn and build a world of nobility for every man and woman.

Tim Chester’s book *Captured by a better vision* (IVP: 2010) exposes the lies and deceptions of porn, inviting us to be free, and showing how this can be achieved.

Elisha Kolade’s book *Pathway to Freedom* (EKM Publication: 2015) documents his journey out of a 14-year pornography addiction which included homosexual pornography and use of prostitutes.

We mentioned in Q 10 that Park et. al (2016) found 49% of respondents “*mentioned at least sometimes searching for sexual content or being involved in [Online Sexual Activity] that were previously not interesting to them or that they considered disgusting.*” We believe that this can also apply to porn featuring, for example, homosexual sex.

Many find counselling or therapy helpful for overcoming pornography addiction. Individuals who have consumed porn that has led to them exposed to or consuming porn of an extreme or homosexual nature must be allowed to seek help and counselling. Proposed so-called conversion therapy legislation could create a fear amongst counsellors or therapists that anyone that asks for help regarding homosexual porn use is asking for conversion therapy. Individuals who find themselves struggling to desist from porn use, including homosexual porn, should be able to receive counselling and therapy to support them in that goal. Our Public Policy Researcher Carys Moseley expressed concerns about the most recent proposed ban on so-called conversion therapy here.⁷⁰

⁶⁷ <https://www.lifestarnetwork.com>

⁶⁸ <https://www.integrityrestored.com>

⁶⁹ <https://realbattle.org>

⁷⁰ <https://christianconcern.com/comment/new-conversion-practices-bill-risks-policing-conversations/>

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