

Disrupting Harm

Evidence from 13 countries on the context, threats, and children's perspectives of online child sexual exploitation and abuse.

Detailed Analysis of Interviews with Government Duty Bearers
Cambodia

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This report is a summary of preliminary data collected for this research project. The perspectives contained herein represent the individuals interviewed and surveyed. Support from the Fund to End Violence Against Children does not constitute endorsement.

Introduction

Disrupting Harm: evidence to understand online child sexual exploitation and abuse (OCSEA), is a unique and collaborative research partnership between ECPAT International, INTERPOL, and UNICEF Office of Research – Innocenti. Leveraging their specific expertise, each partner sheds light on separate but interconnected areas: context, threats and children’s perspectives on online child sexual exploitation.

- Context by ECPAT International through portraying laws & policies in action;
- Threat by INTERPOL through the collection of crime and other data;
- Children’s voices by UNICEF Office of Research - Innocenti through surveys with children and their caregivers.

The countries of focus in Southern and Eastern Africa region are: Ethiopia, Kenya, Mozambique, Namibia, Rwanda, South Africa, Tanzania, and Uganda. The countries of focus in the Southeast Asian region are: Cambodia, Indonesia, Malaysia, Philippines, Thailand, and Vietnam.

Research took place between 2019 and 2021. Up to nine separate research activities were undertaken in each country by the three project partners. Preliminary analysis for each activity was first conducted before the results across all the nine activities were consolidated into each national country report. These can be found here.

This report is the preliminary analysis conducted by ECPAT International of interviews conducted with an identified sample of government duty bearers whose mandates include addressing online child sexual exploitation and abuse at a national level. The aim of interviews was to identify emerging issues and trends, recent progress and upcoming plans and priorities in Cambodia’s current legislative and policy environment. In Cambodia, 9 interviews with a total of 9 participants were conducted from May 2020 to July 2020.

ID Number	Ministry/Government Agency	Position
RA1-CA-02-A	Ministry of Education, Youth and Sport	
RA1-CA-03-A	Ministry of Interior- Cambodia National Police	Vice Chair for National Committee for Counter Trafficking’s Prevention Working Group
RA1-CA-04-A	Ministry of Posts and Telecommunications	
RA1-CA-05-A	Ministry of Women’s Affairs	Director of the Information Security
RA1-CA-06-A	Ministry of Interior – National Committee for Counter Terrorism	
RA1-CA-07-A	Ministry of Information	Vice Chairperson for National Committee for Counter Terrorism
RA1-CA-08-A	Ministry of Justice	State Secretary
RA1-CA-09-A	Telecommunication of Regulator of Cambodia	
RA1-CA-10-A	Cambodia National Council for Children, Ministry of Social Affairs, Veterans and Youth Rehabilitation	

In Cambodia, the Interviews were conducted utilizing a semi-structured interview schedule that allowed for exploration of emerging issues. Due to the COVID-19 pandemic, interviews were conducted both in-person and virtually.

Public awareness

The concept of OCSEA is relatively new to Cambodia, including for officials from government agencies, *“this crime is very new here in Cambodia and the country is further unmodernised”* (RA1-CA-06-A, Vice Chairperson for National Committee for Counter Terrorism, Ministry of Interior – National Committee for Counter Terrorism). Further, representatives from government agencies reported a limited understanding of the concept. Previous research undertaken on Cambodia also found that the leadership of the National Police did not indicate a strong awareness of OCSEA or of the importance of the Internet’s role in child sexual abuse within Cambodian communities.¹

One participant stated that awareness was progressing and that society is gradually understanding the concept OCSEA: *“in Cambodia, some agencies who have the authority to control and suppress, for example, indecent images posted on the Internet, did not understand this issue yet until we told and educated them. Now it is getting better”* (RA1-CA-05-A, Ministry of Women’s Affairs).

Another participant reported that cases of OCSEA are still rare in Cambodia: *“the number of cases specifically relating to sexual abuse in school e.g., at primary school was very few. This was abuse in person not on the Internet or we can say, in the context of school, it was just sexual harassment, not at the level of sexual abuse yet”* (RA1-CA-03-A, Ministry of Interior- Cambodia National Police).

In regard to educational or awareness-raising activities, government agencies have included some topics relating to the use of Information communication technology and Internet safety, but these activities did not include issues related to OCSEA specifically (RA1-CA-05-A, Ministry of Women’s Affairs).

Another participant stated, *“the Ministry used to organise awareness-raising activities on topics concerning laws, legal instruments and guidelines on multiple occasions through direct delivery and mass media, but we did not focus specifically on child sexual exploitation online”* (RA1-CA-09-A, Telecommunication of Regulator of Cambodia).

In contrast, the Cambodia National Council for Children informed that, *“we have organised many training workshops on these topics [OCSEA] over the past years, gathering important stakeholders and relevant actors to participate, especially members of the technical working group on OCSEA. After the release of our initial study on OCSEA,² we have already conducted some dissemination activities and will continue to do more in the future. Regrettably, we are being cut off by COVID-19. Further, when our five year new action plan to respond to OCSEA is finished, we will disseminate the particulars to all the relevant parties and start implementing the plan”* (RA1-CA-10-A, Cambodia National Council for Children, Ministry of Social Affairs, Veterans and Youth Rehabilitation). Law enforcement officers also participated in trainings targeted in provinces that have been identified as more vulnerable to violence

¹ Cambodia National Council for Children. (2019). [Initial Situational Analysis on Online Child Sexual Exploitation \(OCSE\) in Cambodia](#). The Initial Situational Analysis on OCSE in Cambodia research conducted with Action Pour Les Enfants (APLE) was finalised, endorsed by Cambodia National Council for Children after several workshops and has become an official document signed by Ministry of Social Affairs, Veterans and Youth Rehabilitation in March 2020.

² *Ibid.*

against children. There are also activities implemented to raise awareness on both offline and online platforms regarding the abuse of children (RA1-CA-03-A, Ministry of Interior- Cambodia National Police).

One of the participants acknowledged that the lack of understanding of the risk of OCSEA from parents or other adults is reflected when they take inappropriate naked pictures of children and post them online. This was found to be more common in the countryside where children seldom run around and swim in minimal clothing. The National Police is therefore of the view that there is a need to educate the public on the risks of posting inappropriate pictures of children online. One participant noted that *“our goal in implementing the positive parenting strategy is to change the mindset and perspectives of parents in raising children”* (RA1-CA-05-A, Ministry of Women’s Affairs).

Previous research on child rights in Cambodia has found that even though children seem to have a basic understating of their rights, the strong cultural emphasis on family reputation, as well as hierarchy and patriarchy present in parent-child relations, influence the children’s right to protection from sexual abuse.³

One respondent stated that this means the mentality of parents needs to be changed: *“some children are blamed by their parents when they tell them about any problem, so if they face any more problems, they will just keep it to themselves. So, this lesson is very important and helps children to understand what kind of person to tell and what kind of person not to tell”* (RA1-CA-05-A, Ministry of Women’s Affairs). However, the same participant shared that *“we’ve noticed a change in the behaviour of parents raising and educating their children and that society as a whole has an understanding and would report a complaint about it if they see any incident of violence on children and the authority will be willing to take action”* (RA1-CA-05-A, Ministry of Women’s Affairs).

There has been an increase of access to technology for children from wealthier, backgrounds, this was also noted by one participant as increasing children’s vulnerability to OCSEA: *“often children from low-income families are most susceptible to child sexual abuse. However, that is not the case for OCSEA as it is observed that more children from middle- and high-income families who can afford a smartphone or go to schools often with their peers watch pornography on their devices.”* (RA1-CA-03-A, Ministry of Interior- Cambodia National Police).

Our interviews also found that there are not many awareness raising programs that currently exist for school students in Cambodia that cover OCSEA. Most of the programmes are related to general Internet safety and security and did not touch on anything related to sexual abuse and exploitation: *“we have developed materials, leaflets and guidelines on Information communication technology security, or Internet security, and disseminated them via the website, social media, TV, radio and universities but not high school just yet.”* (RA1-CA-04-A, Director of the Information Security, Ministry of Posts and Telecommunications).

Another participant noted that *“nevertheless, within the education sector, we have not taken any specific action [on OCSEA]”* (RA1-CA-03-A, Ministry of Interior- Cambodia National Police).

³ Gourley, S. (2009). [The Middle Way: Bridging the Gap between Cambodian Culture and Children’s Rights.](#)

One participant noted that the major challenge in raising awareness is *“to change people’s attitude. We need a longer time to educate people and promote the understanding of laws”* (RA1-CA-05-A, Ministry of Women’s Affairs).

Government agencies also lack capacity in terms of technical expertise. *“I think the gap might be within our capacity to raise public awareness about this issue”* (RA1-CA-05-A, Ministry of Women’s Affairs).

As a result of the lack of awareness raising programmes on OCSEA, there is a severe lack of awareness and knowledge amongst all parties such as government officials, parents, teachers and communities. In 2015, the Committee on the Rights of the Child expressed that Cambodia had not addressed the underlying root causes and contributing factors leading to vulnerability to sexual exploitation.⁴ Despite the increasing number of initiatives, the preventative measures addressing specifically child sexual abuse material/child sexual exploitation material seem to remain scattered,⁵ with our interviews finding that the dissemination of these awareness raising programmes remains inadequate and very brief (RA1-CA-03-A, Ministry of Interior- Cambodia National Police). The same participant added that *“within the education sector, we have not taken any specific action yet other than providing the awareness sporadically. It was not widespread yet”* (RA1-CA-03-A, Ministry of Interior- Cambodia National Police). Action is urgently needed from government agencies in Cambodia to disseminate OCSEA awareness campaigns and prevention messages rather than general ‘Internet safety’ campaigns.

⁴ Committee on the Rights of the Child. (2015). [Concluding Observations on the Report Submitted by Cambodia](#), Paragraph 16(a).

⁵ ECPAT International. (2018). [ECPAT Country Overview: Cambodia](#).

Government ministries/agencies

Capacity

The National Action Plan to Prevent and Respond to Violence Against Children 2017-2021 includes developing child protection training modules on OCSEA and investigation of such cases for law enforcement.⁶ Responses in interviews indicated that preparation levels are still at the preliminary stage and remain quite general. Any training and programs that were identified that may be relevant were broadly based on violence against children, with none specifically addressing OCSEA: *“we did not have any training guidance yet on OCSEA”* (RA1-CA-02-A, Vice Chair for National Committee for Counter Trafficking’s Prevention Working Group, Ministry of Education, Youth and Sport).

One of the participants stated that *“we have provided training to our healthcare staff on the understanding of violence against children and child sexual abuse. And if such cases are happening and referred to our local healthcare bases, how we will respond, help, and provide appropriate care and treatment; also, after the treatment, how to refer such cases to other appropriate partners for further care and treatment”* (RA1-CA-02-A, Vice Chair for National Committee for Counter Trafficking’s Prevention Working Group, Ministry of Education, Youth and Sport).

In 2019, the Ministry of Health trained trainers in eight provinces covering 150 healthcare bases: *“the training generally focussed on how to provide care and treatment to victims, using the book we have developed which is titled ‘Guiding Book on Healthcare for Victims of Violence and Sexual Abuse’”* (RA1-CA-02-A, Vice Chair for National Committee for Counter Trafficking’s Prevention Working Group, Ministry of Education, Youth and Sport). Unfortunately, due to Covid-19, the Ministry of Health had to postpone the training and thus the training was unable to extend to the other 15 provinces (RA1-CA-02-A, Vice Chair for National Committee for Counter Trafficking’s Prevention Working Group, Ministry of Education, Youth and Sport). It’s important to note however that this training is not focused on OCSEA. The Ministry of Health is also very slow in engaging the private sector in tackling OCSEA and other child sexual abuse offences, however, the representative from the Ministry of Health did state *“we will assess if there’s a possibility that the private sector can engage.”* (RA1-CA-02-A, Vice Chair for National Committee for Counter Trafficking’s Prevention Working Group, Ministry of Education, Youth and Sport). The same participant also suggested that there should be some sort of manual, reference or guidelines for healthcare personnel/officers to understand what OCSEA is and how to enforce prevention and protection in the community: *“for OCSEA, we must incorporate it into our guideline or intervention framework; then, it will be handled and widely disseminated accurately”* (RA1-CA-02-A, Vice Chair for National Committee for Counter Trafficking’s Prevention Working Group, Ministry of Education, Youth and Sport). Most training modules and guidelines do not include matters concerning OCSEA, however, one interviewee noted that there will be a manual for primary and secondary schools produced in collaboration by the National Committee for Counter Trafficking in Persons and the Ministry of Education, Youth and Sports which will *“provide the concept of child abuse including online or sexual violence against children, something like that, and as well as parts of laws and the procedures of complaints. It will be finalised soon and will be incorporated into school curriculums”*

⁶ The Steering Committee on Violence Against Women and Violence Against Children. (2017). [Action Plan to Prevent and Respond to Violence Against Children 2017-2021](#).

⁷ Ministry of Health. (2017). [Clinical Handbook Health Care For Children Subjected To Violence Or Sexual Abuse](#). Kingdom of Cambodia.

(RA1-CA-06-A, Vice Chairperson for National Committee for Counter Terrorism, Ministry of Interior – National Committee for Counter Terrorism). At the time of writing, this manual had still not been published.

One participant informed that *“some hotline calls are not answered. However, it is better these days because at the sub-national level, we have established a multi-disciplinary response team on gender-based violence.”* (RA1-CA-05-A, Ministry of Women’s Affairs). This is due to a shortage of trained officers and a lack of resources to handle the hotlines calls. Law enforcement officers have received some basic training on OCSEA from Action Pour Les Enfants, but some trainings have also been delayed due to the pandemic (RA1-CA-03-A). The interviewee from the Ministry of Education, Youth and Sports also identified that the Ministry has *“created a focal point for each school to monitor and report any incidents of violence in schools. Parents are also engaged and trained. Further, I am also working to develop a child protection guideline. I may call it the School Child Protection Guideline, because currently when there are any violent incidents occurring, there is no specific procedure or mechanisms to follow. It mainly relies on habitual practices to address the problem. We do not have a specific mechanism yet to protect and respond. Therefore, we need a school child protection guideline to set out clear responses when the incident happens.”* (RA1-CA-03-A, Ministry of Interior- Cambodia National Police). The Ministry of Education, Youth and Sports also cooperates with the Ministry of Health to “to integrate sexual and reproductive health education into education programs, which start from primary to secondary education for one hour per week from grade 1 to grade 12.”⁸

Budget

According to a 2018 UNICEF report, the child protection budget in Cambodia is not categorised as a separate budget.⁹ Because of the overarching child protection activities undertaken by different Ministries, it is difficult to estimate the overall amount spent on these issues. National Budget expenses for the implementation of the Convention on the Rights of the Child 2017-2019 has increased by 22.4%, however, only a very small fraction of the budget was allocated to essential child welfare and protection services in Cambodia, actually decreasing by 12.2% from 2017 to 2019.¹⁰ Cambodia’s child protection system has therefore remained weak due to insufficient budgeting. Further, there is no budget allocated to issues relating to OCSEA specifically. *“For the government budget [Ministry of Posts and Telecommunications], we never specifically allocate it for the work we put in for children. State budget normally includes expenditure for workshops, training, seminars or the purchase of equipment. It has never specified on issues concerning children”* (RA1-CA-04-A, Director of the Information Security, Ministry of Posts and Telecommunications). *“We have a lack of resources, both financially and in the workforce, to respond to OCSEA as well as to implement our action plan. Honestly speaking, we do not have a national budget to focus specifically on OCSEA. We have a global budget that the Ministry can spend on its necessary and priority work areas, but this budget is not specified to work on matters concerning children. Sometimes, we must mobilise funds from other departments, development partners and NGOs to execute our planned activities, organise meetings/workshops, develop action plans or conduct training for stakeholders involved. It does require*

⁸ List of Issues in relation to the combined fourth to sixth report of Cambodia.

⁹ UNICEF Cambodia. (March 2018). [A Statistical Profile of Child Protection in Cambodia](#).

¹⁰ List of Issues in relation to the combined fourth to sixth report of Cambodia.

contributions from partners from organisations to curb this massive problem” (RA1-CA-10-A, Cambodia National Council for Children, Ministry of Social Affairs, Veterans and Youth Rehabilitation).

It is essential that the government changes its mindset on the role and capacities of duty bearers responsible for protecting children from all forms of exploitation. They must be provided with adequate funding to enhance protection mechanisms, and funding must be allocated specifically towards OCSEA. One participant did note that despite the lack of budget allocation for child protection, there are ways to circumvent this issue: *“the Ministry of Justice does not have a specific budget for child protection work, but if necessary, the Ministry can still manage to consume the general budget.”* (RA1-CA-09-A, Telecommunication of Regulator of Cambodia). The same participant stated that *“so far, we have cooperated with development partners and NGOs such as UNICEF, Children’s Rights International, Plan International, World Vision etc. implementing joint programs, organisation of joint forums, workshops and pieces of training. Nevertheless, we are still lacking financial resources for implementing all the activities the Ministry has planned, thus requiring more contribution from relevant partners.”* (RA1-CA-09-A, Telecommunication of Regulator of Cambodia). However, even the lead Ministry faces financial challenges, limiting their ability to do their work effectively (RA1-CA-07-A, State Secretary, Ministry of Information). The Ministry of Information does not have a budget for implementing the inter-ministerial action plan, with the government budget only allocated for equipment such as antenna, machinery and for diffusion systems: *“we cannot do anything without financial resources because my Ministry already has the needed materials, broadcasting facility and technicians, but what is important is we don’t have a budget for production. For producing educational programmes, if we don’t have sufficient budget, we can’t do it”* (RA1-CA-07-A, State Secretary, Ministry of Information). The budgetary situation has led some interviewees to approach UNICEF for funds to support them (RA1-CA-07-A, State Secretary, Ministry of Information).

Interestingly, it was identified that the Ministry of Economics and Finance does not understand the issue of preventing violence against children *“when we advocate with the Ministry of Economics and Finance, it’s also difficult because they do not understand much about gender work or the prevention of violence”* (RA1-CA-05-A, Ministry of Women’s Affairs). The same participant also stated that *“we need to develop a sort of results-based program and we need to present clear and specific outcome indicators. For example, the indicators the Ministry of Women’s Affairs may propose are mostly concerned with primary prevention which we can include something like awareness raising, campaigns to prevent violence, education about laws to prevent violence, so on and so forth. So, for us, it is difficult to measure because we only do prevention, workshops and forums. If we want to measure the impact of e.g., violence being decreased, it is hard because it requires a long time. So, when we develop a budget proposal, it is quite challenging.”* (RA1-CA-05-A, Ministry of Women’s Affairs). The Ministry of Economics and Finance is more focused on measurable indicators/impacts to determine budgetary allocation for the respective Ministries in Cambodia. This limited understanding of child protection by planners and budget makers leads to a failure in allocating a sufficient budget for essential child protection issues. In light of this, targeted capacity development programmes for Ministry of Economic and Finance officials on how to effectively plan and budget for child protection, including the development of targets and indicators must be implemented.

Good practices

Unfortunately, nothing significant was identified in our research relating to OCSEA. However, recently the Cambodia National Council for Children led and coordinated the *Initial Study on Online Child Sexual Exploitation in Cambodia*,¹¹ working through the established inter-ministerial technical working group on OCSEA (RA1-CA-10-A, Cambodia National Council for Children, Ministry of Social Affairs, Veterans and Youth Rehabilitation).

¹¹ Cambodia National Council for Children. (2019). [Initial Situational Analysis on Online Child Sexual Exploitation \(OCSE\) in Cambodia](#).

Policies and laws

Assessment

The main legal instrument relating to OCSEA is the Law on Suppression of Human Trafficking and Sexual Exploitation,¹² which does criminalise the production and dissemination of child sexual abuse material (RA1-CA-03-A). *“I do not see that the Law on Suppression of Human Trafficking and Sexual Exploitation needs amendment yet. This law is already clear and complete and built-in accordance with standards and principles of the relevant international laws. The article according to the definition of child pornography is clearly defined. So far, I have not received any information or proposal for amending any articles of this law”* (RA1-CA-09-A, Telecommunication of Regulator of Cambodia). However, another participant believed the Law on Suppression of Human Trafficking and Sexual Exploitation did not adequately address OCSEA *“we seem to have many laws already in place, however, there are not specific and sufficient articles to address OCSEA”* (RA1-CA-10-A, Cambodia National Council for Children, Ministry of Social Affairs, Veterans and Youth Rehabilitation).

The concept of ‘live streaming’ can be considered under “the distribution of child sexual abuse materials” under the Law on Suppression of Human Trafficking and Sexual Exploitation and those found guilty may be prosecuted (RA1-CA-03-A). Thus far, no cases have been investigated in Cambodia in relation to live streaming offences. Further, although the Criminal Code does not prohibit the online solicitation of children for sexual purposes or *online grooming* as a standalone offence, sometimes the law on suppression of human trafficking and sexual exploitation can be applied (RA1-CA-03-A). The same participant claimed that there is no need for new laws as they believed existing legislation was sufficient, suggesting that the biggest challenge was effective implementation of existing legislation (RA1-CA-03-A). It was also identified the government does not pay sufficient attention to the implementation of this legislation: *“our legislation might have some loopholes because this is a new issue, and our laws are old. Currently, the Ministry of Justice is working on law reviews in hopes to amend the criminal and civil codes. Moreover, some people, even some government officials, often do not pay adequate attention to these laws yet.”* (RA1-CA-05-A, Ministry of Women’s Affairs).

Current telecommunication legislation does not address prevention or protection from OCSEA and does not require Internet service providers to take action and responsibility for child sexual abuse material hosted on their servers.¹³ Further, no legislation requires Internet service providers to filter, block and/or remove any child sexual abuse material and report individuals or companies who disseminate, trade, or distribute child sexual abuse material. In regards to this issue, one participant stated *“it depends on the discretion of the Ministry of Posts and Telecommunication because we are a custodian of all those operators, so it’s our Ministry’s decision and authority, however, if we order them to block, what law do we refer to? What rule? If any company does not block, what measure will the Ministry take? If there is a law, they might adhere to it. Yet, we do not know how the forthcoming mechanism is going to be developed. For example, if we want to monitor all the Internet service*

¹² Government of Cambodia. (2008). [Law on Suppression of Human Trafficking and Sexual Exploitation](#), Royal Kram NS/RKM/0208/005.

¹³ Cambodia National Council for Children. (2019). [Initial Situational Analysis on Online Child Sexual Exploitation \(OCSE\) in Cambodia](#).

providers, it is not easy; if we want to know which Internet service provider blocks or does not, we will need to have all the connections of Internet service providers at the Ministry. So, we will ask them to check. If we connect with EZECOM, there must be a connection line of EZECOM; If with ONLINE, there must be with ONLINE; if, with MOBTEL, there must be with MOBTEL. So, we need to have all the lines for us to check e.g., EZECOM, ONLINE. But it's not easy to centralise all the gateways.” (RA1-CA-04-A, Director of the Information Security, Ministry of Posts and Telecommunications). As of now, it is difficult for the government to hold Internet service providers accountable due to the lack of sufficient legislation: *“under the telecommunication law, it only says you must comply with guidelines; you have to protect your customers, so on and so forth. For example, if we ask them to do something based on the law against sexual exploitation and they do not do it”* (RA1-CA-04-A, Director of the Information Security, Ministry of Posts and Telecommunications). Further, there is no legislation requiring Internet service providers to preserve content-based or non-content-based data or to provide such material to law enforcement,¹⁴ and law enforcement has no power to request private parties such as Facebook to preserve the evidence of a crime (RA1-CA-04-A, Director of the Information Security, Ministry of Posts and Telecommunications).

While legislation addressing the responsibility of the telecommunications sector is lacking, Cambodia has been a member of WeProtect Global Alliance since 2013 and has committed to developing/strengthening its national response to OCSEA including initiating preventative and safeguarding strategies.¹⁵ Previous research identified that as a member of the Global Alliance, Cambodia had launched a new National Policy on Child Protection System in July 2020,¹⁶ however this policy is yet to be implemented. An event to promote the new National Policy on Child Protection System was held on 29th July 2020 by the General Secretariat of the Cambodian National Council for Children. The child protection system in Cambodia will invest more on social affairs officials or social staff at sub-national level in order to boost child protection services to be more efficient, consistent and timely and ensure that children have access to legal services and social equity, respond to disasters affecting children and their families and continue gathering, strengthening and expanding existing child protection programmes.¹⁷

As the co-lead Ministry with the Ministry of Social Affairs, Veterans and Youth Rehabilitation, the Ministry of Women’s Affairs was mandated to lead and coordinate the development of the five-year Action Plan to Prevent and Respond to Violence Against Children 2017-2021.¹⁸ Based on research for this project, it was found that the activities outlined in the plan are designed to help support efforts in Cambodia to design and implement effective child-friendly prevention strategies and improve service provision for children who experience violence. Clear legislative gaps, the capacity of law enforcement,

¹⁴ UNICEF. (2016). [Child protection in the digital age. National responses to online child sexual abuse and exploitation in ASEAN Member States.](#)

¹⁵ ASEAN Secretariat. (2019). [The Midterm review of the ASEAN Regional Plan of Action on the Elimination of Violence against Children 2016-2025.](#)

¹⁶ Cambodian National Council for Children. (2020). [National policy on Child Protection System.](#) Government of Cambodia. [Translated from Khmer].

¹⁷ Khmer Times. (2020). [National policy on child protection to provide equal opportunities to all children.](#)

¹⁸ The Steering Committee on Violence Against Women and Violence Against Children. (2017). [Action Plan Ministry of Economic and Finance to Prevent and Respond to Violence Against Children 2017-2021](#)

community awareness and the private industries response to OCSEA are all identified in the plan.¹⁹ The plan does mention a few specific activities related to preventing and responding to OCSEA. This includes education programs aimed at building children’s online safety skills (3.1.1; 3.2.1), strengthening media and communication strategies (2.1.2), enhancing the legislative framework (12.1.7, 12.1.8, 12.1.9) as well as increasing the capacity of law enforcement officers (6.1.2., 6.2.1), child protection (8.2.1, 8.3.3) and health service providers (9.1.5) and legal actors (7.1.1) to properly respond to instances of OCSEA.²⁰ Since the implementation of this plan, the government has not carried out a mid-term review to evaluate its effectiveness as it was led and coordinated by the Ministry of Social Affairs, Veterans and Youth Rehabilitation (RA1-CA-05-A, Ministry of Women’s Affairs). Our research also found that the government budget was limited and thus the implementation relied on financial support from partner organisations. Surprisingly, senior government officials were not aware of the existence of the five-year action plan: *“I’m unaware of this action plan, and neither have I received any information about the execution status and its results”* (RA1-CA-09-A, Telecommunication of Regulator of Cambodia). Conversely, another participant noted that *“about the implementation of this plan, Ministry of Social Affairs, Veterans and Youth Rehabilitation and Cambodian National Council for Children have completed many activities as stipulated in the plan, paying particular attention on service provision, monitoring and evaluation of the implementation by the Ministry”* (RA1-CA-10-A, Cambodia National Council for Children, Ministry of Social Affairs, Veterans and Youth Rehabilitation). However, beyond this topline reporting, little evidence was identified indicating activities that were undertaken. Based on responses from the interviewees regarding this plan, the five-year Action Plan to Prevent and Respond to Violence Against Children 2017-2021 has not been executed effectively due to a lack of capacity and resources.

In May 2018, an Inter-Ministerial Prakas²¹ on Publication Controls of Website and Social Media Processing via the Internet in the Kingdom of Cambodia (Prakas 170) was published by the Ministry of Information, the Ministry of Interior and the Ministry of Posts and Telecommunication.²² Clause 7 of Prakas 170 mandated that all Internet service providers who operate in Cambodia must install specific software programmes and internet surveillance tools to monitor, filter, and block *“illegal”* content, including social media accounts. The same Clause 7 of Prakas 170 also ordered the Ministry of Posts and Telecommunication to *“block or close”* websites and social media pages containing content deemed discriminatory or posing a threat to national security, public interests and social order. One participant shared that *“when there is any problem affecting the online environment, the three Ministries would have a significant role when it comes to illegal contents online, the Ministry of Posts and Telecommunication’s main role is to block access to domains or to block the means used to access websites or contents on the Internet, and also when it involves, for example, a crime happening online would then come to the attention of the Ministry of Interior who’s in the role to enforce the law and investigate”* (RA1-CA-08-A, Ministry of Justice). The same participant stated that *“the*

¹⁹ Cambodia National Council for Children. (2019). [Initial Situational Analysis on Online Child Sexual Exploitation \(OCSE\) in Cambodia.](#)

²⁰ The Steering Committee on Violence Against Women and Violence Against Children. (2017). [Action Plan to Prevent and Respond to Violence Against Children 2017-2021.](#)

²¹ A Prakas is a ministerial or inter-ministerial decision signed by the relevant Minister(s). A proclamation must conform to the Constitution and to the law or sub-decree to which it refers.

²² Government of Cambodia. (2018). [Inter-Ministerial Prakas No. 170 on publication controls of website and social media processing via internet in the Kingdom of Cambodia.](#)

Telecommunication Regulator of Cambodia is the one implementing it (Prakas 170). For our side, we oversee domain names only '.kh' meaning that all domains ending '.kh' are controlled by the Telecommunication Regulator of Cambodia and we are therefore able to enable filtering or blocking. But other websites ending i.e., '.com' or '.org' are controlled by international agencies in other countries, for example, Google, YouTube, Facebook, or other content providers. These are not controlled by us, so, therefore, we need to cooperate with them. If we want to block or filter, we will need to ask them to help and if they can help, it's okay. But sometimes they say they have their own..., so we cannot force them" (RA1-CA-08-A, Ministry of Justice). However, despite these mechanisms being in place, the government did not use Prakas 170 to deal with OCSEA effectively at all. Rather, this broadly drafted Prakas 170 is used to control the political comments/criticisms against the government/political personalities. The same participant stated that *"Prakas number 170 is mainly to control fake news, which is the responsibility of the Ministry of Information, the Ministry of Posts and Telecommunication and the Ministry of Interior. It has very little association with matters on the online exploitation of children. There's no clear role of any Ministry on who should request the Telecommunication of Regulator of Cambodia for the usage of blocking content"* (RA1-CA-08-A, Ministry of Justice).

The Information and Communication Technology Development Policy 2016-2020²³ aims to provide vision, policy framework, coordination framework and institutional arrangements for Telecommunication and Information and communication technology development in Cambodia, with a target to improve child online safety by 2020. However, one participant noted that this target had not been met: *"I suspect this might have to be extended because we've not achieved the target yet. Therefore, it needs to be extended"* (RA1-CA-04-A, Director of the Information Security, Ministry of Posts and Telecommunications). Other plans addressing online technology and communications such as the Cambodian Information and Communication Technology Master Plan 2014-2020²⁴ mainly focuses on expanding the connectivity and infrastructure rather than issues concerning content on the Internet (RA1-CA-08-A, Ministry of Justice).

As well as a lack of legislation addressing the responsibility of the telecommunications sector, our research also identified there was no legislation requiring the registration of child sexual offenders in Cambodia. Criminal background checks are also not required for staff members and teachers in either public, private or community schools. However, as one interviewee noted *"The Ministry of Education, Youth and Sport had already discussed this issue with the British Embassy's representatives and the Ministry is taking considerations. Meanwhile, we have also informed both public and private schools to be cautious when hiring foreign teachers. I believe that H.E Minister has already assigned the regulation team to look into this matter and will provide clear principles to respond"* (RA1-CA-03-A, Ministry of Interior- Cambodia National Police).

When asked if children are involved in the development of policies and practices, one participant noted that children were involved in the development of the child protection law and a workshop was held where children were consulted and invited to join (RA1-CA-03-A). Another participant stated that *"all our youth and children have their voices heard. In school, we have put in place a mechanism to*

²³ Government of Cambodia. (2016). [ICT Development Policy 2016-2020](#).

²⁴ Government of Cambodia. (2014). [The Cambodian ICT Master Plan 2020](#).

promote children’s participation, namely the Children Council in which all children have voices in the process of establishing a school development plan. Based on my monitoring and evaluation, we have achieved by 79%. The movement of children/youth councils has progressed well. The remaining 21% was that there were children councils established in some places, but the signs of progress were not yet satisfactory.” (RA1-CA-02-A).

Challenges and limitations

Accessing relevant data needed for an investigation by law enforcement agencies is a long and complex process. The lack of standardised guidelines among Internet service providers makes it very difficult for law enforcement agencies to obtain relevant information. Additionally, limited cooperation and lack of a centralised communication platform between law enforcement agencies and Internet service providers further complicates the process: *“when it comes to storing user identity data which is kept by mobile companies who store all these data on their database or sever as they need to make sure everything is in place, so when there are problems law enforcement officers can go there to obtain information about the suspect, however, not everyone is authorised to do that. For example, when a crime is committed and there is an opened investigation, law enforcement officers must present a court warrant to access such information.” (RA1-CA-08-A, Ministry of Justice).*

Our research identified that without legislation, the government cannot force Internet service providers to remove or delete child sexual abuse materials online. One participant noted that *“It depends on the Ministry whether that content should be blocked or not. We cannot control them (we don’t have the right to control) or block them as we don’t have law or regulation on this, but we can respond to the request from the police or the Ministry of Information or other ministries in charge of the content. If there is no official request, we cannot act. The Telecommunication Regulator of Cambodia can only block content when there is a request made by other Ministries if they believe that the content is illegal or not appropriate, so if there is such a request, we will proceed to block it. Also, the Telecommunication Regulator of Cambodia cannot control activity on the Internet without law, but when something goes wrong and a request by the law allowing us to block, then it is okay” (RA1-CA-08-A, Ministry of Justice).* At the time of writing, scarcely any blocked websites were related to OCSEA (RA1-CA-08-A, Ministry of Justice).

One participant also noted that continuous co-operation among government agencies is needed. The participant shared that *“we cannot do this effectively alone. We cannot implement our strategy disjointedly. The challenge, at present, is that we are unable to harmonise our action plan yet. Based on my observation, the practice is still very individual.” (RA1-CA-03-A, Ministry of Interior- Cambodia National Police).* The lack of dedicated financial resources for general child-focused issues, let alone for specifically violence against children or OCSEA is also a limiting factor and contributes to delaying the policy from being executed as planned: *“If we look at the budget plan and allocation to each section, we don’t seem to have specific budget lines for programmes for violence against children” (RA1-CA-02-A).*

Future developments

The cybercrime department is currently drafting cyberlaw to better prevent cyber-crimes such as OCSEA and to fill the gap concerning the status of this law (RA1-CA-03-A). It is also observed that the government is taking an extensive amount of time to enact this cybercrime law. The Cyberlaw in

Cambodia is expected to cover amongst others, provisions related to child sexual abuse material and preservation of computer data and traffic data by service providers. The government, via the Cambodia National Council for Children, has also started to develop new action plans to respond to OCSEA that when approved, officials will disseminate among the responsible inter-ministries for implementation (RA1-CA-10-A), however this is reliant on sufficient budget being allocated for the implementation of the plans. One participant stated that *“We have also formed the technical working group at the inter-ministerial level to examine and comment on the research paper, strategic development, and five-year action plan to respond to OCSEA. The Cambodian National Council for Children coordinates efforts and responses of all the Ministries, particularly concerning children matters”* (RA1-CA-10-A, Cambodia National Council for Children, Ministry of Social Affairs, Veterans and Youth Rehabilitation).

The Ministry of Education, Youth, and Sport is one of the members of the Working Group on Gender under the Ministry of Women’s Affairs and is developing the action plan on positive parenting that will be integrated into their educational curriculum (RA1-CA-05-A, Ministry of Women’s Affairs). At the time of writing, there was no confirmation of whether the action plan will include matters related to OCSEA. Furthermore, the Ministry of Education, Youth and Sport is enacting a plan of actions to support the child protection policy in schools that has existed since 2016: *“I have mobilised resources from all the NGOs such as Plan International, Child Fund, World Vision and anyone else working on child protection to develop work plans to implement the Child Protection Policy. We planned to produce the final draft this June but were unable due to COVID, and therefore the action plan was further delayed. However, even if the action plan was not ready, we have started taking some actions already. The action plan is just a roadmap to guide us on what to do and when, but based on the policy in place, we have gradually implemented the required activities.”* (RA1-CA-03-A, Ministry of Interior- Cambodia National Police).

Law enforcement

Law enforcement mechanisms

There are two main police units responsible for investigating crimes against children in Cambodia: The Anti-Human Trafficking and Juvenile Protection Department and The Cybercrime Unit functioning under the Ministry of Interior, established in 2017.²⁵ Both units are comprised of judicial police officers and carry mandates relating to OSCEA. One interviewee informed that *“we witnessed that the Anti Human Trafficking and Juvenile Protection Department and the Anti-Cybercrime Department always collaborate throughout their investigation processes, especially cases involving sexual crimes against children. For instance, when a sexual crime is linked with production or distribution of child pornography on the Internet, the two departments are set to cooperate, resting on their respective role and expertise.”* (RA1-CA-10-A, Cambodia National Council for Children, Ministry of Social Affairs, Veterans and Youth Rehabilitation).

Previous research undertaken on Cambodia has identified barriers within the national criminal justice system, such as the lack of modern technologies and a lack of knowledge on Information and communication technology used by youth. Other barriers identified include a lack of resources to investigate these matters at community level, a lack of connection with technical expertise and existing international resources and an overreliance on traditional, physical methods of investigation which are not helpful for crimes committed in the digital context in Cambodia.²⁶ In addition to this, the specific responsibilities and procedures for responding to OCSEA cases are not clear or designated to a single entity, with one interviewee commenting: *“the police’s investigative procedures concerning this type of OCSEA offenses are still unclear and complicated. Both police and court officials (prosecutors, judges) need additional training on these emerging contexts of crime”* (RA1-CA-10-A, Cambodia National Council for Children, Ministry of Social Affairs, Veterans and Youth Rehabilitation).

Usually, the Anti-Human Trafficking and Juvenile Protection Department is the first unit to receive a case of child exploitation. Once it is discovered that that the case involves technology, it is passed on to the Anti Cybercrime Unit for further investigation.²⁷ The Anti Cybercrime Unit carries the responsibility of following up on the case and conducting further investigation. While the unit should serve as a centralised hub for computer related crimes, it does not have the capacity to investigate Internet crimes and instead, focuses on the physical, forensic investigation of evidence held on electronic devices gathered from criminal raids,²⁸ overlooking the majority of OCSEA-related offences. One interviewee claimed that the police work with law enforcement officers in groups from 25 different areas. Additionally, they have a group where they message each other regarding different cases for sharing information and assisting in identifying victims, making it easier and faster to coordinate investigation (RA1-CA-03-A).

²⁵ Cambodia National Council for Children. (2019). [Initial Situational Analysis on Online Child Sexual Exploitation \(OCSE\) in Cambodia.](#)

²⁶ *Ibid.*

²⁷ *Ibid.*

²⁸ *Ibid.*

Conversely, there is limited collaboration between the Ministry of Posts and Telecommunication, police and courts on OCSEA. *“Police will work with the court to investigate; we won’t be involved in evidence collection or making a statement”* (RA1-CA-04-A, Director of the Information Security, Ministry of Posts and Telecommunications). The same participant informed that *“we would first trace where the website was hosted. My department would need to verify where the site was being hosted, in our country or another country? If in our country, it would be easy. I would just contact the police and they would act and remove it. If in another country, it could take some time. However, in the case where it was hosted in another country, but it involved a Cambodian child or Cambodian citizens, we could then block access to the website here so that Cambodians could not see it. Or we could have another possible mechanism through our incident response team called CamCert Cambodia. This team could email Internet service providers in other countries, asking them to remove access to that child porn site. We would just need to instruct them that we have seen an incident where child pornography was hosted on your server; could you investigate and take it down? This is what we can do”* (RA1-CA-04-A, Director of the Information Security, Ministry of Posts and Telecommunications). Participants noted that Cambodian Police have requested many times that the Ministry of Posts and Telecommunications limit access in the country to all pornography so that people require passwords and age verification to access these websites, however there has been limited progress on this (RA1-CA-03-A).

There is a reporting procedure for the public via Facebook to encourage affected parties including child victims to report cases to the police. Our research identified that a few local and international organisations have some activities that they report are focused on Internet safety in Cambodia. This includes global monitoring and tipline organisations, which work to identify and remove child sexual abuse material/child sexual exploitation material, offer reporting platforms, analyse content and pass OCSEA cases to government entities for investigation and prosecution. Some of the key organisations working actively on Cambodia based OCSEA include: Action Pour Les Enfants, Terre Des Hommes-Netherlands, M’Lop Tapang, Friends International, International Association of Internet Hotlines (via Action Pour Les Enfants), International Center for Missing and Exploited Children, Internet Watch Foundation and Cybertip.ca. One participant noted that the National Police also promote their page and website in collaboration with government entities and NGOs. Police also cooperate with other NGOs that run hotlines such as Action Pour Les Enfants for evidence and collaboration on cases. In regards to OCSEA, most of the complaints they received were direct complaints where victims and families came directly to the station to file the complaint. Apart from collaboration on hotlines, there has been limited effort to collaborate between NGOs and the police on OCSEA, as identified by one participant: *“Up until now, there has been no efforts for collaboration with NGOs or private sector on matters regarding OCSEA.”* (RA1-CA-08-A, Ministry of Justice).

Law enforcement agencies co-operate efficiently with international agencies for both offline and online cases. For instance, in some countries, if there is a known case where a person with a background of offending children enters the country, international police will share intelligence to go after the suspect in Cambodia. They will exchange information and background checks on offenders that enter Cambodia and vice versa, where the police will share information with other countries about Cambodian offenders in other countries (RA1-CA-03-A). The Anti Human Trafficking and Juvenile Protection Department, in particular, has cooperated closely with multiple foreign law enforcement agencies, including the Australian Federal Police, U.S. Homeland Security/FBI, U.K. Police, German Police, French Police, Swedish Police and Austrian Police to investigate sexual exploitation of children

in travel and tourism perpetrated by foreigners (RA1-CA-10-A, Cambodia National Council for Children, Ministry of Social Affairs, Veterans and Youth Rehabilitation). One participant discussed *“preventing human trafficking at the inter-country level through a mechanism called COMMIT. They have been involved mostly in sex trafficking of children cases, but for case interventions, the Ministry of Interior and the Ministry of Foreign Affairs are the lead agencies to coordinate. The international counterparts within COMMIT have also discussed the issue of OCSEA. It is hard to prevent this problem because each country must strengthen the management of Internet connectivity and the education of users”* (RA1-CA-05-A, Ministry of Women’s Affairs).

Challenges and limitations

One participant noted *“our legislation is clear and strong, but enforcement is still limited due to the lack of resources, both either in knowledge or skills”* (RA1-CA-07-A, State Secretary, Ministry of Information). Additionally, the lack of understanding among law enforcement is very apparent *“I think the understanding of different forms of criminal offences relating to OCSEA among police and court officials is still limited.”* (RA1-CA-10-A, Cambodia National Council for Children, Ministry of Social Affairs, Veterans and Youth Rehabilitation). The same participant stated that *“we should integrate OCSEA topics into the Police Academy training curriculum or Bar Association’s. And we should perhaps create a group of lawyers specialised in OCSEA. We’ve also seen many successful examples of cooperation between the national police and other local and international agencies, including NGOs to respond to these issues.”* (RA1-CA-10-A, Cambodia National Council for Children, Ministry of Social Affairs, Veterans and Youth Rehabilitation). Another participant shared that *“investigator’s capacity has not advanced parallel to the advancement of technology”* (RA1-CA-04-A, Director of the Information Security, Ministry of Posts and Telecommunications). It was also identified that law enforcement do not have the latest modern technologies and tools: *“we do not have enough equipment or legislation to enhance the investigation. Technology is furthering, but the capability of our police has not progressed. So, this makes it extremely challenging”* (RA1-CA-04-A, Director of the Information Security, Ministry of Posts and Telecommunications). Collection of evidence – especially digital evidence - is also challenging, as law enforcement does not possess the tools to examine digital evidence quickly to meet the time constraints needed so that the Cybercrime Unit can proceed with investigations. Unregistered SIM cards are an added obstacle when it comes to determining IP addresses and associating them with the phone’s owner. Despite the directives of the Ministries of Posts and Telecommunications and National Police in 2018 that all telecommunications companies in Cambodia must ensure all their SIM card users were registered, the Internet regulators estimate that around 10% of current SIM cards remain unregistered.²⁹

One participant also noted difficulties in working with Internet service providers: *“So far, police should have had direct contacts with those Internet service provider companies e.g., to ask for additional information. But particularly for our department, we have not worked directly with Internet service providers yet in such cases because it should have involved blocking pornographic sites in general. We used to contemplate on this matter to find a solution to block some sites, and not to allow it open freely.”* (RA1-CA-04-A, Director of the Information Security, Ministry of Posts and Telecommunications). When the police receive a case from the National Centre for Missing and

²⁹ *Ibid.*

Exploited Children, they will send it to them and ask the department to identify the victim. It is also difficult for prosecutors to trace IP numbers or user accounts that can be used as evidence, so the cybercrime Unit sometimes aids in this process. (RA1-CA-03-A).

Families and victims often receive payments from offenders, which makes it difficult to investigate. Further, suspects operate clandestinely and do not leave evidence. Defence lawyers pose a challenge in persecution, and when the evidence is not strong enough against their client, it is sufficient to make sure the client does not get punished (RA1-CA-03-A). *“We have difficulty to find the perpetrator because the perpetrator often only communicates online and sometimes you know, they changed their account already because they can create an account themselves illegally. We do not have the tools for the recognition of Wi-Fi or other online names. So, that is the challenge we face.”* (RA1-CA-06-A, Vice Chairperson for National Committee for Counter Terrorism, Ministry of Interior – National Committee for Counter Terrorism). A participant from the Ministry of Posts and Telecommunication commented on the lack of political commitment in protecting children from all forms of exploitation including OCSEA: *“it is important to have political support and will. If everyone does it together, then it will be done”* (RA1-CA-04-A, Director of the Information Security, Ministry of Posts and Telecommunications).

Successes

There has been limited success in tackling OCSEA in Cambodia. In 2012, a Prakas was issued by the Ministry of Posts and Telecommunication and the Ministry of Interior requiring all Sim-card users to register with their national ID. If Cambodians want to use a Sim-card, they must submit a copy of their ID card. For foreigners, they must submit a copy of their passport, valid visa, or any equivalent proof which identifies themselves. *“Enforcing this Prakas has brought about good impacts because if in any circumstances a crime happens on the Internet, law enforcement agencies under the Ministry of Interior can cooperate with the Ministry of Posts and Telecommunication to identify or locate the suspect quickly as they are registered. There, this effort is crucial, and the Ministry is managing them well; hopefully, this will continue, and we will be able to manage it at 100%”* (RA1-CA-08-A, Ministry of Justice).

Challenges

Interviewees identified a number of challenges ranging from OCSEA being a borderless crime: *“I think this crime is not only performed in this country”* (RA1-CA-06-A) to children’s lack of understanding of OCSEA *“the children cannot analyse the seriousness of OCSEA”* (RA1-CA-06-A, Vice Chairperson for National Committee for Counter Terrorism, Ministry of Interior – National Committee for Counter Terrorism). Further, participants claimed that a main risk for children online is exposure to pornography, with one participant claiming when children watch pornography it encourages them to try what they see in the images themselves. (RA1-CA-03-A). This belief does not align with the evidence on this topic – watching pornography does not make a child more likely to be targeted by an adult offender. That this was commonly stated suggests that there are misunderstandings on the issues that may even lead to victim blaming and doubt.

The evolving nature of technology was also raised as a challenge by interviewees *“nowadays children use many news applications. They can set their account to a public or private account and connect with others. They can view and send pictures and information as well as communicate with each other so it’s very hard to manage even for us, parents, teacher, or the authority”* (RA1-CA-06-A, Vice Chairperson for National Committee for Counter Terrorism, Ministry of Interior – National Committee for Counter Terrorism). The same participant added that the increase in the usage of smartphones also represented a big challenge in tackling OCSEA in Cambodia. One government official expressed a strong view that *“I always say that the Ministry of Education, Youth and Sport should not allow children and students to use the phone or smartphone in class”* (RA1-CA-06-A, Vice Chairperson for National Committee for Counter Terrorism, Ministry of Interior – National Committee for Counter Terrorism). Internet and social media usage and access and the availability of personal computers and smartphones is rapidly increasing throughout communities in Cambodia and is predicted to continue.³⁰ Mobile phones are a fundamental part of life now and bans will not reduce risks. Instead, young people need risk awareness and avenues for help-seeking.

Further, parents do not know about emerging applications, making it very difficult for them to monitor their children’s activities on the Internet (RA1-CA-06-A, Vice Chairperson for National Committee for Counter Terrorism, Ministry of Interior – National Committee for Counter Terrorism). Another participant added that *“parents often cannot manage the on-going communication between their child and the perpetrator”* (RA1-CA-06-A), while another commented *“we are afraid they (children) have access to harmful content (photos and videos online) and their parents are not aware of the advanced technology, so they do not have any idea of whether their children are using it safely or not.”* (RA1-CA-09-A, Telecommunication of Regulator of Cambodia). Difficulties in grappling with developing technology and parents’ awareness of OCSEA was compounded by government officials demonstrating a lack of commitment in dealing with child sexual exploitation cases including OCSEA, with one participant noting *“the challenges remain within law enforcement and judicial institutions, like the courts. They are not committed to getting involved and this has caused some difficulties”* (RA1-CA-05-A, Ministry of Women’s Affairs). Further, the same participant added that *“another thing is, the lack of workforce and financial resources”* (RA1-CA-05-A, Ministry of Women’s Affairs).

³⁰ *Ibid.*