



COMBATING CHILD EXPLOITATION: THE EVOLUTION OF INTERNATIONAL APPROACHES AND PROSPECTS FOR UZBEKISTAN

Yuriy Mikhailovich Li

Lecturer at the Department of Legal and Socio-Humanitarian Disciplines, Tashkent Academic Lyceum No. 1 of the Ministry of Internal Affairs of the Republic of Uzbekistan

Abdusattar Bakhriddinovich Kulakhmetov

Senior Lecturer at the Department of Legal and Socio-Humanitarian Disciplines, Tashkent Academic Lyceum No. 1 of the Ministry of Internal Affairs of the Republic of Uzbekistan, Candidate of Legal Sciences, Associate Professor

Namaz Sanakulovich Eshov

Senior Lecturer at the Department of Legal and Socio-Humanitarian Disciplines, Tashkent Academic Lyceum No. 1 of the Ministry of Internal Affairs of the Republic of Uzbekistan

Dildora Zokhid qizi Yunusova

Senior Lecturer at the Department of Legal and Socio-Humanitarian Disciplines, Tashkent Academic Lyceum No. 1 of the Ministry of Internal Affairs of the Republic of Uzbekistan

Abstract

This article analyzes the development of international mechanisms for combating child exploitation, with a particular focus on the evolution of approaches over the past fifteen years. It examines the experience of the United States in organizing efforts to combat child exploitation, including the structure of specialized units and their priority areas of activity. Special attention is given to contemporary challenges associated with the digitalization of crime and the use of information



and communication technologies for the exploitation of children. Based on an analysis of international experience, the article formulates recommendations for improving the national system for combating child exploitation in Uzbekistan, taking into account recent legislative developments, including the adoption of the Law of the Republic of Uzbekistan “On the Protection of Children from All Forms of Violence” (No. ZRU-996, dated November 14, 2024), which entered into force in 2025.

Keywords: Child exploitation, child trafficking, child pornography, crime prevention, child digital safety, Uzbekistan, international cooperation.

Introduction

The problem of child exploitation remains one of the most acute issues in contemporary international human rights discourse. Over the past fifteen years, significant changes have occurred both in the understanding of the scale and forms of this phenomenon and in the approaches to its prevention and suppression. While at the time of the adoption of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children (2000), the emphasis was placed primarily on transnational organized crime, today the range of recognized threats has expanded considerably.

The digital transformation of society, the development of global information networks, and the emergence of new forms of online child exploitation have created fundamentally new challenges for law enforcement systems worldwide. Under these conditions, the analysis of foreign experience—particularly that of the United States, which possesses one of the most advanced systems for combating child exploitation—becomes especially relevant for improving national mechanisms for the protection of children's rights.

The purpose of this article is to analyze the evolution of international approaches to combating child exploitation, to generalize the experience of organizing efforts to address this phenomenon in the United States in light of current trends, and to propose directions for improving the child protection system in Uzbekistan in the context of recent legislative developments.



1. Evolution of International Legal Mechanisms for Combating Child Exploitation. The Palermo Protocol of 2000 marked an important stage in the development of international cooperation in combating trafficking in persons. However, over the past two decades, the international community has come to recognize that effective protection of children from exploitation requires not only criminal law measures, but also comprehensive preventive strategies, as well as consideration of new forms of exploitation emerging in the digital environment.

1.1. Expansion of the Conceptual Framework

Contemporary international instruments have significantly broadened the understanding of the forms of child exploitation. The United Nations Committee on the Rights of the Child, in its General Comments (in particular, General Comment No. 13 on the right of the child to freedom from all forms of violence, and General Comment No. 25 on children’s rights in the digital environment), emphasizes the need to take into account not only traditional forms of exploitation (such as forced labor, sexual exploitation, and organ removal), but also phenomena such as: online grooming — establishing trust-based relationships with a child via the internet for the purpose of subsequent sexual exploitation; cyberbullying — systematic harassment and humiliation of a child in the digital environment; child sexual abuse material (CSAM) — an evolution in terminology from “child pornography” to a more precise definition reflecting the criminal nature of such materials; exploitation of children within vulnerable migration flows — including children traveling without the accompaniment of legal guardians.

1.2. Development of Institutional Mechanisms

One of the significant achievements of recent years has been the establishment of specialized international coordination mechanisms. In 2021, the United Nations General Assembly adopted a resolution on the appointment of the Special Representative of the Secretary-General on Violence against Children—an institution that currently plays a key role in monitoring the situation and formulating recommendations.

At the regional level, cooperation mechanisms are also being actively developed. Within the framework of the Council of Europe, the Network of National Rapporteurs on Trafficking in Human Beings operates, while the European Union



has established the European Cybercrime Centre (EC3) within Europol, which coordinates the efforts of member states in combating the online exploitation of children.

1.3. Uzbekistan's Accession to International Mechanisms

Uzbekistan has been consistently expanding its participation in international mechanisms aimed at combating child exploitation. In addition to ratifying the Palermo Protocol and the Optional Protocol to the Convention on the Rights of the Child on the sale of children, child prostitution, and child pornography, the country actively participates in the work of: the Group of States against Corruption (GRECO), in aspects related to child protection; the Special Representative of the UN Secretary-General on Violence against Children; the International Organization for Migration (IOM), within programs aimed at preventing trafficking in persons.

In 2025, with the adoption of the Law "On the Protection of Children from All Forms of Violence," Uzbekistan took an important step toward the implementation of modern international standards into national legislation, including an expanded definition of forms of child exploitation and the establishment of an interagency response system.

2. The Experience of the United States:

Institutional Structure and Operational Priorities. The United States possesses one of the most advanced systems for combating child exploitation, which is обусловлено both the scale of the challenges (the U.S. is considered one of the largest consumers of child sexual abuse material globally) and a long history of institutionalizing this area of activity.

2.1. Child Exploitation and Obscenity Section (CEOS)

The central element in the U.S. system for combating child exploitation is the Child Exploitation and Obscenity Section (CEOS), which operates within the Criminal Division of the U.S. Department of Justice.

Since its establishment in the 2010s (with significant development occurring after 2011), this structure has undergone substantial evolution, expanding its powers and strengthening its coordinating role. Today, CEOS performs the following key



functions: Coordination of federal investigations: CEOS ensures cooperation among federal prosecutors, the Federal Bureau of Investigation (FBI), the United States Secret Service, U.S. Immigration and Customs Enforcement (ICE), and other agencies.

Support for local law enforcement authorities: CEOS provides expert guidance, methodological materials, and resources to prosecutors and investigators at the local level.

Development of strategic priorities: CEOS defines the most significant areas of activity, including: online child exploitation; transnational sexual exploitation (including sex tourism); production and distribution of child sexual abuse material (CSAM); exploitation of children in labor and other forms.

2.2. Priority Areas of Activity

In accordance with the current priorities of the United States Department of Justice, the Child Exploitation and Obscenity Section (CEOS) focuses on the following categories of crimes:

Category	Contemporary Content
Online child exploitation	Including grooming, sextortion (coercion to obtain intimate materials), and live-streamed sexual abuse
Child sexual abuse material (CSAM)	With a focus on emerging forms, including synthetic images generated using artificial intelligence
Sex tourism	Including the prosecution of U.S. citizens committing offenses abroad (extraterritorial jurisdiction)
Child trafficking	For labor, sexual, and other purposes
Sexual offenses in federal territories	Including military bases, national parks, and Native American reservations

In recent years, particular emphasis has been placed on combating the transnational exploitation of children through the use of digital technologies. CEOS actively collaborates with the Virtual Global Taskforce, an international alliance dedicated to online child protection, as well as with the National Center



for Missing and Exploited Children (NCMEC), which serves as a central hub for the collection and dissemination of information on suspicious materials.

2.3. Innovative Approaches

Contemporary practice in the United States demonstrates several innovative approaches that merit particular attention:

A. Interagency Task Forces (ICAC Task Forces)

The Internet Crimes Against Children (ICAC) Program brings together 61 specialized task forces covering all U.S. states. These task forces include personnel from local, regional, and federal law enforcement agencies, prosecutors, digital forensics specialists, and social workers.

B. Technological Solutions. CEOS and its partner organizations develop and implement advanced technological tools, including: automated systems for detecting CSAM based on hashing technologies (e.g., PhotoDNA); tools for tracking cryptocurrency transactions used to pay for child exploitation materials; analytical platforms designed to identify networks involved in child trafficking.

C. Victim-Centered Approach. Contemporary U.S. policy places strong emphasis on supporting child victims. This includes: the establishment of specialized Child Advocacy Centers (CACs), where law enforcement officers, medical professionals, psychologists, and social workers operate under one roof using a multidisciplinary model; ensuring the involvement of psychologists at all stages of judicial proceedings; the implementation of long-term rehabilitation and reintegration programs for victims.

3. Lessons for Uzbekistan: Prospects for Improving the National System. An analysis of international experience, including U.S. practices, makes it possible to formulate a number of recommendations for improving the system of countering child exploitation in Uzbekistan, taking into account contemporary challenges and recent developments in national legislation.

3.1. Development of Institutional Coordination. The Law “On the Protection of Children from All Forms of Violence” (2025) has established a legal framework for interagency cooperation. However, for its effective implementation, it is advisable to: establish a specialized coordination unit under the General Prosecutor’s Office of the Republic of Uzbekistan, analogous to CEOS, which would ensure: coordination of the activities of law enforcement agencies, the



Ministry of Internal Affairs, the Ministry of Youth Affairs, and the Ministry of Preschool and School Education; collection and analysis of data on cases of child exploitation; methodological support for investigations; develop a network of specialized child assistance centers, modeled after Child Advocacy Centers, integrating the efforts of law enforcement officers, psychologists, medical professionals, and social workers.

3.2. Adaptation of Criminal Legislation. In light of contemporary challenges, including the digital exploitation of children, it appears advisable to consider introducing amendments and additions to the Criminal Code of the Republic of Uzbekistan:

1. Establishing distinct criminal offenses for the most serious forms of child exploitation, including: online grooming; the production, possession, and distribution of child sexual abuse materials (with clarified legal terminology); the exploitation of children in the digital environment.
2. Introducing extraterritorial jurisdiction for crimes committed by citizens of Uzbekistan abroad, including those related to child exploitation in the context of sex tourism.
3. Strengthening liability for repeat offenses against the sexual inviolability of minors, including the imposition of prohibitions on engaging in activities involving work with children.

3.3. Development of Digital Protection Infrastructure. In the context of rapid digitalization, the establishment of a technological infrastructure for protecting children online becomes particularly important: Establishment of a national center for combating online child exploitation, modeled after NCMEC, which would: receive reports of suspicious materials; analyze and forward relevant information to law enforcement authorities; maintain a database of identified materials; cooperate with international partners.

Development of training systems for law enforcement officers, judges, and prosecutors in modern methods of investigating crimes related to the digital exploitation of children, including the handling of digital evidence.

3.4. International Cooperation. Uzbekistan actively participates in international efforts to combat the exploitation of children. Promising areas for further development of cooperation include: 1. Accession to the Second Optional Protocol to the Convention on the Rights of the Child (if not yet fully



implemented), along with active participation in its monitoring mechanisms. 2. Expansion of bilateral cooperation agreements in the field of combating transnational child exploitation, including information exchange and mutual legal assistance. 3. Participation in international networks, such as the Virtual Global Taskforce and the European Cybercrime Centre (EC3) within the framework of cooperation with Europol.

3.5. Improvement of the Legal Framework for Adoption. In order to prevent illegal adoption and the illicit transfer of children abroad, it is advisable to: Strengthen state control over adoption procedures, including more thorough screening of prospective adoptive parents. Establish a unified information database on children deprived of parental care and individuals wishing to adopt or take a child into care. Introduce criminal liability for intermediary activities in the sphere of illegal adoption.

Conclusion

Over the past decade and a half, international approaches to combating the exploitation of children have undergone significant transformation. The focus has shifted from primarily addressing transnational organized crime to a more comprehensive understanding of the issue, encompassing the emerging challenges of the digital era—such as online grooming, the dissemination of child sexual abuse materials, and the exploitation of children within vulnerable migration flows.

The experience of the United States demonstrates the importance of establishing specialized institutional structures (such as CEOS and ICAC Task Forces) endowed with broad coordination powers and maintaining close cooperation with the technology sector and non-governmental organizations. Key elements of an effective system include a victim-centered approach, a well-developed support infrastructure for affected children, and the continuous advancement of technological tools for prevention and response.

In recent years, Uzbekistan has made significant progress in establishing a legal framework for the protection of children from exploitation. The adoption of the Law “On the Protection of Children from All Forms of Violence” (2025) has laid the foundation for systematic efforts in this area. Further development requires strengthening institutional coordination mechanisms, adapting criminal



legislation to contemporary challenges, creating a robust digital protection infrastructure, and enhancing international cooperation.

The implementation of these measures will enable Uzbekistan not only to fulfill its international obligations in the field of child rights protection but also to establish an effective system capable of timely detection and prevention of child exploitation, thereby ensuring children's right to a safe childhood and full development.

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