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# Legislative Overview

# CSAM legislation and its implications on removing CSAM from the internet

*An overview of CSAM legislation when put in practice by INHOPE hotlines.*

Created April 2020

## Introduction

The strength of the INHOPE network comes from its interconnected, global nature which allows for the exchange and rapid removal of Child Sexual Abuse Material around the world. However, the reality of operating in 40 different legal jurisdictions comes with challenges, especially with the classification of material. Types of content that are illegal in certain countries may not be treated similarly across the entire network. This document sets out to delineate the legislative framework for each of the countries INHOPE member hotlines operate in, and serve as a reference list for, the legality of certain content types.

## International and National Illegality

When assessing content, hotlines utilise both international and national criteria. The international criteria stem from INTERPOL, which maintains a 'Baseline' list of the digital signatures of some of the worst child abuse material.

**'Baseline'** is the international standard that aims to isolate the worst of child abuse materials that would be considered illegal in any country.

To be considered as baseline, the material has to show:

- A real child (not an artificially created image)
- A prepubescent child (no sign or very first signs of puberty, appearing to be younger than 12 or 13 years old)
- The child involved in/witness to sexual activities; or
- The media has a clear focus on the child's sexual/anal area.

Material that does not meet the standards of baseline, or internationally illegal, may still be considered nationally illegal, but this is contingent on the national legislation of the country in question. The national legislation and Notice and Takedown procedures differ in all 42 countries where INHOPE member hotlines operate.

## Content Types

Hotlines receive reports on numerous different types of content related to illegal material. The national laws that govern these categories differ per jurisdiction, so the treatment of and the action that can be taken on a single type of content may vary from hotline to hotline. This document covers the following categories:

**Hotline mandate** (technical and regarding content): what is the hotline mandate under national legislation to process online CSAM

**Relationship with Hosting Providers (HP) and Law Enforcement Agency (LEA):** does the hotline have a Memorandum of Understanding (MoU) signed with these partners

**Legal basis for operation:** which legislation or agreements are put in place for the hotline to be able to process and analyse online CSAM reports

**Content types:** which of the following content types are illegal in a country and what are the exceptions to the rule. The content can be illegal, not illegal and/or dependent on context. The illegality and hosting location define the actions taken by a hotlines. If the reported CSAM is hosted within the reporting country, the hotline sends Notice and Takedown orders to LEA and HPs according to national procedures. If the reported CSAM is hosted in another country, the hotline transfers the report through ICCAM to the hotline in the hosting country. If no hotline exists in the hosting country, the reports are processed by other INHOPE member hotlines.

- Drawings/manga/artistic interpretations of CSAM
- Digitally generated CSAM/realistic images representing a minor engaged in sexually explicit conduct.
- A minor appearing to be an adult engaged in sexually explicit conduct.
- An adult person appearing to be a minor engaged in sexually explicit conduct.
- Child grooming
- Sexual extortion of children or soliciting children for sexual purposes.
- Apparent self-generated sexual material
- Sexualised modelling or posing
- Sexualised images of children
- Text depictions of CSAM
- Fictional text depictions of CSAM
- Praise of paedophilia or CSA
- Manual on CSA
- Declaration of committing CSA.

**Context:** does the context in which the material is portrayed have an influence on the illegality of the material

- Images in a medical context
- Non-explicit images in a series of images that contain CSAM.
- Non-explicit images that have comments or captions of a sexual nature attached to them.

**Content Locations:** is the hotline allowed by national legislation to access any of the online locations indicated below.

- Private site types (Password protected)
- Peer to peer (torrent, emule, Kat)
- Dropbox/cloud/similar file hosting services
- Tor/Onion
- Livestreamed CSE/CSA
- File Transfer protocol (Ftp://)
- Social media accounts
- Email
- Usenet
- Messengers (Telegram, WhatsApp)

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*Brazil – Safernet Brasil*

*Cyprus – CyberSafety – Hotline 1480*

*Hungary – Internet Children’s Safety Service*

*New Zealand – Netsafe New Zealand*

*Philippines – ECPAT Philippines*

*South Korea – KCSC*

*Spain – Incibe*

*Taiwan – ECPAT Taiwan*

*Thailand – ThaiHotline*

NETWORK

# Member hotlines

Hotline Mandate

## *Australia - Cyber Report operated by eSafety Commissioner*

### **Legal basis for operation:**

Actions permitted under law: Broadcasting Services Act 1992, Criminal Code Act 1995, and Telecommunications Act 1997. Online content is assessed under the National Classification Scheme which is based on the Classification (Publications, Films and Computer Games) Act 1995. The eSafety Commissioner's broader functions are set out in the Enhancing Online Safety Act 2015.

### **Relationship with Law enforcement:**

MoUs held with Australian Federal, State and Territory Police. Reports are sent to LEA when CSAM is hosted in Australia or if the content involves an Australian victim and/or offender. The hotline Cyber Report also notifies overseas hosted CSAM (where there is no INHOPE member) to the Australian Federal Police for their information.

### **Relationship with hosting providers:**

The hotline has 100% compliance with all NTDs issued. Cyber Report will contact the hosting provider directly and issue a takedown notice for prohibited content hosted in Australia. Feedback is received by way of the hosting provider confirming that they have removed the content and complied with the notice.

### **Other content dealt with:**

Under the Broadcasting Services Act 1992 and the National Classification Scheme the hotline can action prohibited online content that includes: child sexual abuse material, any other exploitative or offensive descriptions or depictions of children, promotion of paedophile activity, promotion in crime or violence and content that advocates terrorism. Under the Criminal Code Act 1995 the hotline can notify perpetrator-produced abhorrent violent material that records murder, attempted murder, torture, rape, kidnapping and terrorist acts. Under the Telecommunications Act 1997 and a protocol developed with Australian service providers the hotline can direct time-limited blocking of websites providing access to terrorist or violent criminal material in an online crisis event (an event that involves terrorist or violent criminal material being disseminated online in a manner likely to cause significant harm to the Australian community, and that warrants a rapid, coordinated and decisive response by industry and relevant government agencies).



**What age constitutes a child:**

Under 18 years of age for purposes of the hotline's work, as described in the Criminal Code Act 1995. However, a child is defined as a person under the age of 16 or 17 years in some state and territory criminal laws relating to child sexual abuse material, in accordance with the age of consent to sexual activity.

Content Type	Legal Status	Actions Taken	Comments/Explanations
<b>Drawings/manga/artistic interpretations of CSAM</b>	Illegal (dependent on context)	Notice to LEA. NTD to HP.	Under the classification guidelines, context is crucial in determining whether content is justified or not. Fictional storylines that may involve abuse or exploitation as part of a justified narrative may not be considered CSAM. Australian hosting providers must remove prohibited content if notified by the hotline. If an HP or content host becomes aware of child exploitation or abuse on their service, they must report this to the Australian Federal Police. Any Australian hosted illegal content/CSAM is first notified to the relevant state or territory police force for their review and authorisation before a takedown notice is issued.
<b>Digitally generated CSAM/realistic images representing a minor engaged in sexually explicit conduct</b>	Illegal	Notice to LEA. NTD to HP.	
<b>A minor appearing to be an adult engaged in sexually explicit conduct</b>	Illegal	Notice to LEA. NTD to HP.	
<b>An adult person appearing to be a minor engaged in sexually explicit conduct</b>	Illegal	Notice to LEA. NTD to HP.	
<b>Child grooming</b>	Illegal	Notice to LEA.	
<b>Sexual extortion of children or soliciting children for sexual purposes</b>	Illegal	Notice to LEA.	
<b>Apparent self-generated sexual material</b>	Illegal (dependent on context)	Notice to LEA. NTD to HP.	Under the classification guidelines, context is crucial in determining whether content is justified or not. Images justified by context may not meet a threshold for reporting. Some defences and exceptions have been introduced in relevant criminal legislation to prevent the criminalisation of children.
<b>Sexualised modelling or posing</b>	Illegal (dependent on context)	Notice to LEA. NTD to HP.	Under the classification guidelines, context is crucial in determining whether content is justified or not. Fictional storylines that may involve abuse or exploitation as part of a justified narrative may not be considered CSAM.
<b>Sexualised images of children</b>	Illegal (dependent on context)	Notice to LEA. NTD to HP.	Under the classification guidelines context is crucial in determining whether content is justified or not. Fictional storylines that may involve abuse or exploitation as part of a

			justified narrative may not be considered CSAM.
<b>Text depictions of CSAM</b>	Illegal (dependent on context)	Notice to LEA. NTD to HP.	Under the classification guidelines, context is crucial in determining whether content is justified or not. Fictional storylines that may involve abuse or exploitation as part of a justified narrative may not be considered CSAM.
<b>Fictional text depictions of CSAM</b>	Illegal (dependent on context)	Notice to LEA. NTD to HP.	Under the classification guidelines, context is crucial in determining whether content is justified or not. Fictional storylines that may involve abuse or exploitation as part of a justified narrative may not be considered CSAM.
<b>Praise of paedophilia or CSA</b>	Illegal (dependent on context)	Notice to LEA. NTD to HP.	Content which promotes or provides instruction in paedophile activity is prohibited.
<b>Manual on CSA</b>	Illegal	Notice to LEA. NTD to HP.	Content which promotes or provides instruction in paedophile activity is prohibited.
<b>Declaration of committing CSA</b>	Illegal	Notice to LEA.	

Context	Legal Status	Actions Taken	Comments/Explanations
<b>Images in a medical context</b>	Not illegal. Not treated as CSAM.		This content is unlikely to be considered illegal. The literary, artistic, and educational context is taken into consideration when assessing content.
<b>Non-explicit images in a series of images that contain CSAM</b>	Treated as CSAM.	Notice to LEA. NTD to HP	Non-explicit images that meet the threshold for exploitative or offensive depictions of a child (whether the child is engaged in sexual activity or not) are considered CSAM.
<b>Non-explicit images that have comments or captions of a sexual nature attached to them</b>	Treated as CSAM.	Notice to LEA. NTD to HP.	Surrounding context and juxtaposition is considered when assessing content.

Content Location	Accessibility	Actions Taken	Comments/explanation
<b>Private site types (Password protected)</b>	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HP.	Content referred to INHOPE, takedown notice issued or request website to remove.
<b>Peer to peer (torrent, emule, Kat)</b>	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HP.	Cyber Report downloads the file/s and refer relevant IP information obtained to LEA. The hotline hashes CSAM images located. The hotline requests websites to remove links to illegal BitTorrent content.
<b>Dropbox/cloud/similar file hosting services</b>	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HP.	Content referred to INHOPE, takedown notice issued or request website to remove.
<b>Tor/Onion</b>	Allowed to access.	Notice to LEA. NTD to HP.	CSAM sites notified to Australian Federal Police for their information. Clear web

	Allowed to send NTDs.		content investigated and referred to INHOPE or takedown issued.
<b>Livestreamed CSE/CSA</b>	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HP.	Content referred to INHOPE, takedown notice issued or request website to remove.
<b>File Transfer protocol (Ftp://)</b>	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HP.	Content referred to INHOPE, or takedown notice issued.
<b>Social media accounts</b>	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HP.	Content referred to INHOPE, takedown notice issued or request website to remove.
<b>Email</b>	Not allowed to access or send NTDs.		Cyber Report does not have the power to investigate content contained in personal/private messages such as voicemail, videomail, email, SMS, or MMS messages.
<b>Usenet</b>	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HP.	Content referred to INHOPE, takedown notice issued where possible to the origin server provider. Moderated newsgroups contacted if possible.
<b>Messengers (Telegram, WhatsApp)</b>	Not allowed to access or send NTDs.		Cyber Report does not have the power to investigate content contained in personal/private messages such as voicemail, videomail, email, SMS, or MMS messages.

Hotline Mandate

## *Austria – Stopline*

### **Legal basis for operation:**

No formal legal basis - there is an informal cooperation with the national Law Enforcement Agency and supported by written statement from the Ministry of Justice.

### **Relationship with Law enforcement:**

Stopline has no MOU but various support letters; the hotline works together very closely, with regular meetings at least twice a year. Stopline has two departments they work with regarding the scope of activities - BK & BVT; they are sent all reports for information and are informed whether Stopline notified the HP or partner hotline so that they can take further steps in all other cases.

### **Relationship with hosting providers:**

As the hotline is run by the ISP association, it has close contact with the ISPs. The ISPs are aware of the hotline procedures and the hotline contacts them directly in case of NTD.

### **Other content dealt with:**

Stopline also investigates reports relating to endorsement of National Socialist ideology (Prohibition Act and Insignia Act as a basis).

### **What age constitutes a child:**

Pornographic representations of minors (pursuant to section 207a Austrian Criminal Code - StGB) refers to images of sexual acts or pictures with a focus of the genitals of persons under the age of 18.

Content Type	Legal Status	Actions Taken	Comments/Explanations
Drawings/manga/artistic interpretations of CSAM	Not illegal	None	
Digitally generated CSAM/realistic images representing a minor engaged in sexually explicit conduct	Illegal	Notice to LEA. NTD to HP.	
A minor appearing to be an adult engaged in sexually explicit conduct	Unknown		
An adult person appearing to be a minor engaged in sexually explicit conduct	Illegal	Notice to LEA. NTD to HP.	
Child grooming	Illegal	Notice to LEA. NTD to HP.	
Sexual extortion of children or soliciting children for sexual purposes	Unknown		
Apparent self-generated sexual material	Illegal	Notice to LEA. NTD to HP.	
Sexualised modelling or posing	Not illegal	None	
Sexualised images of children	Illegal	Notice to LEA. NTD to HP.	
Text depictions of CSAM	Not illegal	None	
Fictional text depictions of CSAM	Not illegal	None	
Praise of paedophilia or CSA	Illegal	Notice to LEA.	
Manual on CSA	Illegal (dependent on context)	Notice to LEA. NTD to HP.	It is illegal for a manual to be written to convince others to commit such a crime.
Declaration of committing CSA	Not illegal	None	

Context	Legal Status	Actions Taken	Comments/Explanations
Images in a medical context	Not illegal	None	
Non-explicit images in a series of images that contain CSAM	Not illegal	None	
Non-explicit images that have comments or captions of a sexual nature attached to them	Not illegal	None	

Content Location	Legal Status	Actions Taken	Comments/Explanations
Private site types (Password protected)	Not allowed to access or send NTDs.		
Peer to peer (torrent, emule, Kat)	Allowed to access.	Notice to LEA.	If the content is accessible without password protection.
Dropbox/cloud/similar file hosting services	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HP.	
Tor/Onion	Allowed to access.	Notice to LEA.	NTD is not possible.
Livestreamed CSE/CSA	Allowed to access.	Notice to LEA.	NTD is not possible.
File Transfer protocol (Ftp://)	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HP.	
Social media accounts	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HP.	
Email	Not allowed to access or send NTDs.		
Usenet	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HP.	
Messengers (Telegram, WhatsApp)	Allowed to access.	Notice to LEA.	If the content is accessible without password protection.

## *Belgium - Child Focus*

### **Legal basis for operation:**

Allowed by law: Article 383bis/1 of the Criminal Code (indirectly) forms the legal basis for Child Focus being able to receive and analyse CSAM reports; Royal Decree of 18 September 2016 prescribes the criteria an organisation should fulfil in order to be able to receive and analyse CSAM reports; Royal Decree of 15 November 2016 explicitly recognises Child Focus as an Organisation competent to receive and analyse CSAM reports.; MOU of 2017 with the LEA and Crown Prosecutor.

### **Relationship with Law enforcement:**

Child Focus has an MoU in place. It sends the following reports to the LEA: illegal material hosted in Belgium, and illegal material hosted in a country where no INHOPE hotline is established. On a regular basis, Child Focus also transfers an overview of all reports, illegal and non-illegal. The Child Focus hotline only deals with CSAM. Other reports related to sexual exploitation online and offline (sexting, sextortion, grooming and exploitation in prostitution, in tourism) or missing children are transferred to Child Focus' colleagues operating the Helpline and 116000 hotline. The following steps are also guided by the MoU. The Helpline and 16000 hotline will take the necessary steps: contact the LEA, support parents of other persons affected, contact prosecutors, start a search and find campaign, finding the right psychological, medical, legal, and/or other types of help for the person in question, contact social media services, etc.

### **Relationship with hosting providers:**

Child Focus does have contact with Belgian Internet Service Providers Association, but there are no agreements in place. Child Focus does not send NTD requests as they do not have the official mandate to do so. Child Focus does contact social media services as trusted flaggers. Child Focus does have an informal agreement with Twoo, a Belgian social media service. Twoo sends Child Focus suspicious accounts or accounts not in line with their policy.

### **Other content dealt with:**

Child Focus is the Belgian Center for Missing and Sexually Exploited Children. As the Belgian 116000 hotline for missing children, Child Focus takes on five different cases of disappearances: runaways, abduction by a third person, missing unaccompanied migrant minors, lost/injured or otherwise missing children and parental abductions. Child Focus is also a contact point for reports on sexual exploitation and runs alongside the civil hotline for child sexual abuse material on the internet ([www.stopchildporno.be](http://www.stopchildporno.be)), a helpline for all questions related to e-safety for children ([www.clicksafe.be](http://www.clicksafe.be)). The Center for Missing and Sexually Exploited children holds an 'operational cell,' a 'study/policy advising cell,' and a team of 'project

managers' (focusing on prevention), to ensure coherence between the operational reality and the theoretical input. Everything is based on an MoU, aside from the hotline's ability to receive and process CSAM reports, so no legislative basis is necessary.

#### What age constitutes a child:

A child is a person under the age of 18. In any case 18 is also the benchmark when it comes to CSAM, as well as in the case of sexual exploitation vs. prostitution. However, when it comes to sexual contact, the age of consent is currently 16 (it will be brought to 14 in the future).

Content Type	Legal Status	Actions Taken	Comments/Explanations
Drawings/manga/artistic interpretations of CSAM	Illegal	Notice to LEA. LEA sends NTD to HP.	
Digitally generated CSAM/realistic images representing a minor engaged in sexually explicit conduct	Illegal	Notice to LEA. LEA sends NTD to HP.	
A minor appearing to be an adult engaged in sexually explicit conduct	Illegal	Notice to LEA. LEA sends NTD to HP.	
An adult person appearing to be a minor engaged in sexually explicit conduct	Illegal	Notice to LEA. LEA sends NTD to HP.	
Child grooming	Illegal	Transfer to Helpline. Notice to LEA.	
Sexual extortion of children or soliciting children for sexual purposes	Illegal	Transfer to Helpline. Notice to LEA.	
Apparent self-generated sexual material	Illegal	Notice to LEA. LEA sends NTD to HP.	
Sexualised modelling or posing	Illegal (dependent on context)	Notice to LEA. LEA sends NTD to HP.	No set definition of 'sexualised.'
Sexualised images of children	Illegal (dependent on context)	Notice to LEA. LEA sends NTD to HP.	
Text depictions of CSAM	Illegal	Notice to LEA. LEA sends NTD to HP.	
Fictional text depictions of CSAM	Illegal	Notice to LEA. LEA sends NTD to HP.	
Praise of paedophilia or CSA	Not illegal		
Manual on CSA	Illegal	Notice to LEA.	
Declaration of committing CSA	Illegal (dependent on context)	Notice to LEA. LEA sends NTD to HP.	



Context	Legal Status	Actions Taken
Images in a medical context	Not illegal	
Non-explicit images in a series of images that contain CSAM	Not illegal	
Non-explicit images that have comments or captions of a sexual nature attached to them	Illegal	Notice to LEA.

Content Location	Accessibility	Actions Taken	Comments/Explanations
Private site types (Password protected)	Not allowed to access or send NTD.		Child Focus can access all locations if it is open or if a person concerned allows it - cracking private messages or accounts are not allowed. Child Focus can check social media accounts if public. Child Focus can check pictures it receives from the public - related to peer to peer, private messages etc. But Child Focus can never conduct investigations. It must be able to access the content. If not, the hotline transfers it to LEA.
Peer to peer (torrent, emule, Kat)	Not allowed to access or send NTD.		
Dropbox/cloud/similar file hosting services	Allowed to access.	Notice to LEA. LEA sends NTD to HP.	
Tor/Onion	Allowed to access.	Notice to LEA. LEA sends NTD to HP.	
Livestreamed CSE/CSA	Allowed to access.	Notice to LEA. LEA sends NTD to HP.	
File Transfer protocol (Ftp://)	Not allowed to access or send NTD.		
Social media accounts	Allowed to access.	Notice to LEA. LEA sends NTD to HP.	
Email	Allowed to access.	Notice to LEA. LEA sends NTD to HP.	
Usenet	Allowed to access.	Notice to LEA. LEA sends NTD to HP.	
Messengers (Telegram, WhatsApp)	Allowed to access.	Notice to LEA. LEA sends NTD to HP.	

## ***Bosnia - IFS-EMMAUS***

### **Legal basis for operation:**

Protocol on cooperation with LEAs

### **Relationship with Law enforcement:**

The Protocol on cooperation of the Safer Internet Centre and Hotline with LEAs was signed in 2019 and 2020. Due to administrative and political division of Bosnia and Herzegovina (BiH), there are 3 LEAs. The hotline filters all reports and forwards CSAM-related and other illegal material to LEAs. The hotline has good communication/coordination with LEAs by phone or email, and coordination meetings take place regularly. Within the Protocol, LEAs delegate experts for prevention/education/information activities and implementation (e.g., training, seminars etc).

### **Relationship with hosting providers:**

Thanks to strong advocacy efforts, the Communication Regulatory Agency of BiH (CRA) agreed to lead the process of establishing the coordination platform between CRA, ICT, service providers and law enforcement professionals. The Guidelines for socially responsible information and communication companies, in the field of protection of children from sexual exploitation and abuse, as the basis for the platform in BiH, have been developed, approved by the CRA, printed, and distributed to all currently licensed services providers.

### **Other content dealt with:**

None

### **What age constitutes a child:**

Child/minor is any person below the age of 18 years, Article 2 of the Law on Protection and Treatment of Children and Juveniles in Criminal Proceedings Federal Bosnia and Herzegovina, Republika Srpska and Brčko District.

Content Type	Legal Status	Actions Taken	Comments/Explanations
Drawings/manga/artistic interpretations of CSAM	Not illegal	Notice to LEA.	This type is not defined by the law in BiH.
Digitally generated CSAM/realistic images representing a minor engaged in sexually explicit conduct	Not illegal	Notice to LEA.	This type is not defined by the law in BiH.
A minor appearing to be an adult engaged in sexually explicit conduct	Illegal	Notice to LEA. LEA sends NTD to HP.	It is defined in all 3 Criminal codes as "Exploitation of a child or minor for pornography."
An adult person appearing to be a minor engaged in sexually explicit conduct	Not illegal	Notice to LEA.	
Child grooming	Not illegal	Notice to LEA.	This type is not defined by the law in BiH.
Sexual extortion of children or soliciting children for sexual purposes	Illegal	Notice to LEA. LEA sends NTD to HP.	
Apparent self-generated sexual material	Not illegal	Notice to LEA.	This type is not defined by the law in BiH.
Sexualised modelling or posing	Not illegal	Notice to LEA.	This type is not defined by the law in BiH.
Sexualised images of children	Not illegal	Notice to LEA.	This type is not defined by the law in BiH.
Text depictions of CSAM	Not illegal	Notice to LEA.	This type is not defined by the law in BiH.
Fictional text depictions of CSAM	Not illegal	Notice to LEA.	This type is not defined by the law in BiH.
Praise of paedophilia or CSA	Not illegal	Notice to LEA.	This type is not defined by the law in BiH.
Manual on CSA	Not illegal	Notice to LEA.	This type is not defined by the law in BiH.
Declaration of committing CSA	Illegal	Notice to LEA. LEA sends NTD to HP.	

Context	Legal Status	Actions Taken	Comments/Explanations
Images in a medical context	Not illegal & not treated as CSAM.		
Non-explicit images in a series of images that contain CSAM	Not illegal & not treated as CSAM.		
Non-explicit images that have comments or captions of a sexual nature attached to them	Not illegal & not treated as CSAM.		

Content Location	Accessibility by Law	Actions Taken	Comments/Explanations
Private site types (Password protected)	Allowed to access. Allowed to send NTDs	Notice to LEA.	
Peer to peer (torrent, emule, Kat)	Allowed to access. Allowed to send NTDs	Notice to LEA.	
Dropbox/cloud/similar file hosting services	Not allowed to access or send NTDs	Notice to LEA.	
Tor/Onion	Not allowed to access or send NTDs	Notice to LEA.	
Livestreamed CSE/CSA	Allowed to access. Allowed to send NTDs	Notice to LEA.	
File Transfer protocol (Ftp://)	Allowed to access. Allowed to send NTDs	Notice to LEA.	
Social media accounts	Allowed to access. Allowed to send NTDs	Notice to LEA.	
Email	Not allowed to access or send NTDs	Notice to LEA.	
Usenet	Allowed to access. Allowed to send NTDs	Notice to LEA.	
Messengers (Telegram, WhatsApp)	Allowed to access. Allowed to send NTDs	Notice to LEA.	

## ***Bulgaria – SafenetBG***

### **Legal basis for operation:**

Memorandum for cooperation signed with the Ministry of Interior.

### **Relationship with Law enforcement:**

Based on the MoU with the Ministry of Interior, SafenetBG has very good cooperation with the LEA in charge - Cybercrime Unit at the General Directorate for Combating Organised Crime. The hotline sends them reports via a specially established email channel: it sends high priority reports about CSAM hosted in the country, but also reports concerning cases of cyberbullying and “not illegal but harmful for minors” online content such as pro-ana, pro-suicidal, drugs use content, etc.

### **Relationship with hosting providers:**

The national Association of ISPs is a member of SafenetBG's Advisory Board. However, LEA will contact a specific provider for NTD in cases of illegal (CSAM) content. SafenetBG contacts them directly about reports of not illegal but harmful content.

### **Other content dealt with:**

As for illegal content - only CSAM and sexual grooming. But SafenetBG also deals with content that is not illegal but harmful for minors.

### **What age constitutes a child:**

Child is any person under the age of 18. But the Penal code provides for different punishments based on under 18, under 16 and under 14 years of age.

Content Type	Legal Status	Actions Taken	Comments/Explanations
Drawings/manga/artistic interpretations of CSAM	Illegal	Notice to LEA. LEA sends NTD to HP.	
Digitally generated CSAM/realistic images representing a minor engaged in sexually explicit conduct	Illegal	Notice to LEA. LEA sends NTD to HP.	LEA investigates who is disseminating if in national jurisdiction and sends notice and takedown.
A minor appearing to be an adult engaged in sexually explicit conduct	Illegal	Notice to LEA. LEA sends NTD to HP.	Depending on the content - identifying the minor and transfer the case to social services.
An adult person appearing to be a minor engaged in sexually explicit conduct	Illegal	Notice to LEA. LEA sends NTD to HP.	
Child grooming	Illegal	Notice to LEA.	
Sexual extortion of children or soliciting children for sexual purposes	Illegal	Notice to LEA.	
Apparent self-generated sexual material	Illegal	Notice to LEA. LEA sends NTD to HP.	
Sexualised modelling or posing	Not illegal	None	
Sexualised images of children	Not illegal	Notice to LEA. LEA sends NTD to HP.	
Text depictions of CSAM	Not illegal	Notice to LEA. LEA sends NTD to HP.	
Fictional text depictions of CSAM	Not illegal	Notice to LEA. LEA sends NTD to HP.	
Praise of paedophilia or CSA	Not illegal	Notice to LEA. LEA sends NTD to HP.	
Manual on CSA	Not illegal	Notice to LEA. LEA sends NTD to HP.	
Declaration of committing CSA	Illegal (dependent on context)	Notice to LEA.	Usually this will lead to an investigation.

Context	Legal Status	Actions Taken	Comments/Explanations
Images in a medical context	Unknown		The hotline has not received any reports of this kind, but the context will be crucial to consider whether to treat it as CSAM.
Non-explicit images in a series of images that contain CSAM	Not illegal	None	
Non-explicit images that have comments or captions of a sexual nature attached to them	Unknown		Depending on the context, could be considered as CSAM.

Content Location	Accessibility by Law	Actions Taken	Comments/Explanations
Private site types (Password protected)	Allowed to access.	Notice to LEA.	Based on the MoU and operational procedures confirmed by LEA there are no limitations to access any location.
Peer to peer (torrent, emule, Kat)	Allowed to access.	Notice to LEA.	
Dropbox/cloud/similar file hosting services	Allowed to access.	Notice to LEA.	
Tor/Onion	Allowed to access.	Notice to LEA.	
Livestreamed CSE/CSA	Allowed to access.	Notice to LEA.	
File Transfer protocol (Ftp://)	Allowed to access.	Notice to LEA.	
Social media accounts	Allowed to access.	Notice to LEA.	
Email	Allowed to access.	Notice to LEA.	
Usenet	Allowed to access.	Notice to LEA.	
Messengers (Telegram, WhatsApp)	Allowed to access.	Notice to LEA.	

## *Cambodia - Internet Hotline Cambodia (IHC) operated by Action Pour Les Enfants (APLE)*

### **Legal basis for operation:**

APLE works closely with the Royal Government of Cambodia and has signed a MoU to register and outline the scope of its work. Run by APLE, IHC operates based on the MoU between the Ministry of Interior and APLE signed on September 12, 2019.

### **Relationship with Law enforcement:**

APLE has become a leading expert in responding to online and offline child sexual exploitation and abuse (CSEA) and works closely with Cambodia National Police and its specialist Anti-Human Trafficking and Juvenile Protection Units and Anti-Cybercrime Units, aiding in preliminary investigation, capacity building and training.

### **Relationship with hosting providers:**

IHC engages Hosting Providers (HPs), webmasters, content providers, etc. in learning activities through dialogues and workshops where they can gain an understanding of online risks, how they can contribute to stopping the problem, and recommendations to make their service safer for their clients. If IHC finds content hosted in Cambodia to be illegal, IHC will forward the information to Anti-Cybercrime Department (ACCD) to have the content removed and the matter investigated, or to the mandated agency. IHC will receive feedback from ACCD upon request.

### **Other content dealt with:**

None.

### **What age constitutes a child:**

A minor is a person below the age of 18 years.



Content Type	Legal Status	Actions Taken	Comments/Explanations
Drawings/manga/artistic interpretations of CSAM	Illegal (dependent on context)	Notice to LEA. LEA sends NTD to HPs.	Medical reason is an exception.
Digitally generated CSAM/realistic images representing a minor engaged in sexually explicit conduct	Illegal	Notice to LEA. LEA sends NTD to HPs.	
A minor appearing to be an adult engaged in sexually explicit conduct	Illegal	Notice to LEA. LEA sends NTD to HPs.	
An adult person appearing to be a minor engaged in sexually explicit conduct	Illegal	Notice to LEA. LEA sends NTD to HPs.	
Child grooming	Not illegal		If it involves distribution of CSAM or adult pornography to a minor, it can be punishable by law. Then actions taken:  Notice to LEA. LEA sends NTD to HP.
Sexual extortion of children or soliciting children for sexual purposes	Illegal	Notice to LEA. LEA sends NTD to HPs.	
Apparent self-generated sexual material	Illegal	Notice to LEA. LEA sends NTD to HPs.	
Sexualised modelling or posing	Illegal (dependent on context)	Notice to LEA. LEA sends NTD to HPs.	There is no specific law. However, if the content depicts any naked figure of a private part, it would be considered CSAM, otherwise such material would also be against cultural norm in the country.
Sexualised images of children	Illegal (dependent on context)	Notice to LEA. LEA sends NTD to HPs.	
Text depictions of CSAM	Illegal (dependent on context)	Notice to LEA. LEA sends NTD to HPs.	Medical reason is an exemption.
Fictional text depictions of CSAM	Illegal (dependent on context)	Notice to LEA. LEA sends NTD to HP.	Medical reason is an exemption.
Praise of paedophilia or CSA	Not illegal	Notice to LEA. LEA sends NTD to HPs.	No specific law on this yet.
Manual on CSA	Illegal	Notice to LEA. LEA sends NTD to HPs.	
Declaration of committing CSA	Illegal	Notice to LEA. LEA sends NTD to HPs.	

Context	Legal Status	Actions Taken	Comments/explanation
Images in a medical context	Not illegal & not treated as CSAM.		If the images are used in medical reason or education, IHC would take no action unless there is an abuse or privacy violation involved.
Non-explicit images in a series of images that contain CSAM	Not illegal but treated as CSAM.	Notice to LEA. LEA sends NTD to HPs.	The report will be forwarded to national LEA/hosting provider or another responsible hotline.
Non-explicit images that have comments or captions of a sexual nature attached to them	Not illegal & not treated as CSAM.		Such content will be considered harmful content and removal request will be sent to hosting provider.

Content Location	Accessibility by Law	Actions Taken	Comments/explanation
Private site types (Password protected)	Allowed to access. Allowed to send NTDs	Notice to LEA. LEA sends NTD to HPs.	If the password was given by reporter, the hotline will access to analyse the content and the report will be forwarded to national LEA/hosting provider or another responsible hotline.
Peer to peer (torrent, emule, Kat)	Allowed to access. Allowed to send NTDs	Notice to LEA. LEA sends NTD to HPs.	The report will be forwarded to national LEA or another responsible hotline.
Dropbox/cloud/similar file hosting services	Allowed to access. Allowed to send NTDs	Notice to LEA. LEA sends NTD to HPs.	The report will be forwarded to national LEA/hosting provider or another responsible hotline.
Tor/Onion	Allowed to access. Allowed to send NTDs	Notice to LEA. LEA sends NTD to HPs.	The report will be forwarded to national LEA or another responsible hotline.
Livestreamed CSE/CSA	Allowed to access. Allowed to send NTDs.	Notice to LEA. LEA sends NTD to HPs.	The report will be forwarded to national LEA/hosting provider or another responsible hotline.
File Transfer protocol (Ftp://)	Allowed to access. Allowed to send NTDs	Notice to LEA. LEA sends NTD to HPs.	The report will be forwarded to national LEA or another responsible hotline.
Social media accounts	Allowed to access. Allowed to send NTDs	Notice to LEA. LEA sends NTD to HPs.	The report will be forwarded to national LEA/hosting provider or another responsible hotline.
Email	Allowed to access. Allowed to send NTDs	Notice to LEA. LEA sends NTD to HPs.	The report will be forwarded to national LEA/hosting provider or another responsible hotline.
Usenet	Allowed to access. Allowed to send NTDs	Notice to LEA. LEA sends NTD to HPs.	The report will be forwarded to national LEA/hosting provider or another responsible hotline.
Messengers (Telegram, WhatsApp)	Allowed to access. Allowed to send NTDs	Notice to LEA. LEA sends NTD to HPs.	The report will be forwarded to national LEA/hosting provider or another responsible hotline.

Hotline Mandate

## *Croatia – Centar za nestalu i zlostavljjanu djecu (CNZD)*

### **Legal basis for operation:**

The hotline has cooperation with LEA but no formal agreement and are not allowed to assess and classify CSAM reports.

### **Relationship with Law enforcement:**

CNZD sends every report that is hosted in Croatia to LEA.

### **Relationship with hosting providers:**

CNZD has informal cooperation with the providers, but only LEA and the court can order the removal of content.

### **Other content dealt with:**

Hate speech, racial and ethnic discrimination.

### **What age constitutes a child:**

Under 18.

Content Type	Legal Status	Actions Taken	Comments/Explanations
Drawings/manga/artistic interpretations of CSAM	Illegal	Notice to LEA. LEA sends NTD to HPs.	
Digitally generated CSAM/realistic images representing a minor engaged in sexually explicit conduct	Illegal	Notice to LEA. LEA sends NTD to HPs.	
A minor appearing to be an adult engaged in sexually explicit conduct	Illegal	Notice to LEA. LEA sends NTD to HPs.	
An adult person appearing to be a minor engaged in sexually explicit conduct	Illegal	Notice to LEA. LEA sends NTD to HPs.	
Child grooming	Illegal	Notice to LEA. LEA sends NTD to HPs.	
Sexual extortion of children or soliciting children for sexual purposes	Illegal	Notice to LEA. LEA sends NTD to HPs.	
Apparent self-generated sexual material	Illegal	Notice to LEA. LEA sends NTD to HPs.	
Sexualised modelling or posing	Illegal (dependent on context)	Notice to LEA. LEA sends NTD to HPs.	
Sexualised images of children	Illegal (dependent on context)	Notice to LEA. LEA sends NTD to HPs.	
Text depictions of CSAM	Illegal (dependent on context)	Notice to LEA. LEA sends NTD to HPs.	
Fictional text depictions of CSAM	Illegal (dependent on context)	Notice to LEA. LEA sends NTD to HPs.	
Praise of paedophilia or CSA	Illegal (dependent on context)	Notice to LEA. LEA sends NTD to HPs.	
Manual on CSA	Illegal (dependent on context)	Notice to LEA. LEA sends NTD to HPs.	
Declaration of committing CSA	Illegal (dependent on context)	Notice to LEA. LEA sends NTD to HPs.	

Context	Legal Status	Actions Taken
Images in a medical context	Illegal	Notice to LEA.
Non-explicit images in a series of images that contain CSAM	Illegal	Notice to LEA.
Non-explicit images that have comments or captions of a sexual nature attached to them	Illegal	Notice to LEA.

Content Location	Accessibility by Law	Actions Taken
Private site types (Password protected)	N/A (the hotline is not allowed to review reports; therefore the content location is irrelevant in its work. All reports are sent to LEA)	Notice to LEA.
Peer to peer (torrent, emule, Kat)	N/A	Notice to LEA.
Dropbox/cloud/similar file hosting services	N/A	Notice to LEA.
Tor/Onion	N/A	Notice to LEA.
Livestreamed CSE/CSA	N/A	Notice to LEA.
File Transfer protocol (Ftp://)	N/A	Notice to LEA.
Social media accounts	N/A	Notice to LEA.
Email	N/A	Notice to LEA.
Usenet	N/A	Notice to LEA.
Messengers (Telegram, WhatsApp)	N/A	Notice to LEA.

## *Czech Republic - STOPonline.cz*

### **Legal basis for operation:**

The Declaration of Cooperation with the Police of the Czech Republic, the National Headquarters for Combating Organised Crime, Criminal Police, and Investigation Service.

### **Relationship with Law enforcement:**

The Declaration of Cooperation with the Police of the Czech Republic, the National Headquarters for Combating Organised Crime, Criminal Police, and Investigation Service sets out the relationship with LEA. The hotline sends all reports received through ICCAM to the LEA.

### **Relationship with hosting providers:**

STOPonline.cz works under CSIRT.CZ and has direct contact with the hosting provider to whom the hotline sends requests for content removal. The hotline receives feedback from the hosting provider.

### **Other content dealt with:**

STOPonline.cz is primarily intended for reporting content that depicts child abuse, inappropriate childhood nudity, cyber-grooming, or could involve the spread of pornography. If certain conditions are met cyber-grooming can be considered as these crimes: trafficking human beings (§ 168), illegal restraint (§ 171), extortion (§ 175), rape (§ 185), sexual abuse (§ 187), endangering a child's care (§ 201), fraud (§ 209), dangerous threatening (§ 353), dangerous pursuing (§ 354), establishing illicit contact with a child. (§ 193b) Reports on fake e-shops are also passed to LEA. Fake e-shops can be considered a crime of fraud.

### **What age constitutes a child:**

A child is any human being under the age of 18 unless he or she has reached the age of majority before. According to the Civil Code, the age of majority is reached upon reaching 18 years of age. According to the Criminal Code, as a child shall be understood to be a person under 18 years of age, unless the Criminal Code provides otherwise.

Content Type	Legal status	Actions Taken	Comments/Explanations
Drawings/manga/artistic interpretations of CSAM	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	Depends on the intention of the perpetrator to use it for child abuse and the degree of reality of the image.
Digitally generated CSAM/realistic images representing a minor engaged in sexually explicit conduct	Illegal	Notice to LEA. NTD to HPs.	
A minor appearing to be an adult engaged in sexually explicit conduct	Illegal	Notice to LEA. NTD to HPs.	
An adult person appearing to be a minor engaged in sexually explicit conduct	Illegal	Notice to LEA. NTD to HPs.	
Child grooming	Illegal	Notice to LEA. NTD to HPs.	
Sexual extortion of children or soliciting children for sexual purposes	Illegal	Notice to LEA. NTD to HPs.	
Apparent self-generated sexual material	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	Depends on the intention of the perpetrator to use the material for child abuse and depends on the type of crime.
Sexualised modelling or posing	Not illegal	None	In Czech law, there is no legal definition of "sexualised."
Sexualised images of children	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	Depends on the intention of the perpetrator and it is assessed on a case-by-case basis.
Text depictions of CSAM	Not illegal		Depends on the intention of the perpetrator and it is assessed on a case-by-case basis.
Fictional text depictions of CSAM	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	Depends on the intention of the perpetrator and it is assessed on a case-by-case basis.
Praise of paedophilia or CSA	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	Depends on the intention of the perpetrator and it is assessed on a case-by-case basis.
Manual on CSA	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	Depends on the intention of the perpetrator and it is assessed on a case-by-case basis.
Declaration of committing CSA	Not illegal		Depends on the intention of the perpetrator and it is assessed on a case-by-case basis.



Context	Legal Status	Actions Taken
Images in a medical context	Not illegal	None
Non-explicit images in a series of images that contain CSAM	Not illegal	None
Non-explicit images that have comments or captions of a sexual nature attached to them	Illegal	Notice to LEA. NTD to HPs.

Content Location	Accessibility by Law	Actions Taken
Private site types (Password protected)	Allowed to access. Allowed to send NTDs	Notice to LEA. NTD to HPs.
Peer to peer (torrent, emule, Kat)	Allowed to access. Allowed to send NTDs	Notice to LEA. NTD to HPs.
Dropbox/cloud/similar file hosting services	Allowed to access. Allowed to send NTDs	Notice to LEA. NTD to HPs.
Tor/Onion	Allowed to access. Allowed to send NTDs	Notice to LEA. NTD to HPs.
Livestreamed CSE/CSA	Allowed to access. Allowed to send NTDs	Notice to LEA. NTD to HPs.
File Transfer protocol (Ftp://)	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.
Social media accounts	Allowed to access. Allowed to send NTDs	Notice to LEA. NTD to HPs.
Email	Allowed to access. Allowed to send NTDs	Notice to LEA. NTD to HPs.
Usenet	Allowed to access. Allowed to send NTDs	Notice to LEA. NTD to HPs.
Messengers (Telegram, WhatsApp)	Allowed to access. Allowed to send NTDs	Notice to LEA. NTD to HPs.

## *Colombia - Te Protejo operated by Red PaPaz*

### **Legal basis for operation:**

Pursuant to article 9 of Law 679 of 2001, the Ministry of Technologies of the Information and Communications (Ministry of TIC) must implement an electronic hotline to report CSAM. In order to comply with the foregoing obligation, in 2012 the Ministry of TIC entered into an agreement with Red PaPaz, other agencies and two service providers, aimed at launching Te Protejo. Since 2012, Te Protejo has been operating and has received support and resources from the parties that entered into the agreement. Red PaPaz administers Te Protejo and enters periodically into agreements and/or MOUs with government and law enforcing bodies to coordinate its operation with these entities in order to seek the protection of the rights of children and adolescents.

Furthermore, under article 40 of Law 1098 of 2006, civil society organizations such as Red PaPaz are authorized to report or denounce to the competent authorities any situation that violates or threatens the rights of children and adolescents.

### **Relationship with Law enforcement:**

As mentioned above, Te Protejo was created by virtue of an agreement entered into by the Ministry of TIC, Red PaPaz, other agencies and two service providers. Te Protejo fulfils a duty specifically assigned to the Ministry of TIC according to Law 679 of 2001. Moreover, Te Protejo works alongside the National Police and has established the protocols regarding the report and submission of CSAM to the authorities.

Whenever Te Protejo verifies CSAM, not hosted in Colombia, a report is submitted to the DIJIN (Directorate of Criminal Investigation and INTERPOL) of the National Police so that this specialized body can carry out the notification to the Ministry of TIC, that will then publish the list of URLs that must be blocked by service providers. Also, Te Protejo submits reports on cyberbullying to the same Directorate of National Police.

In addition to the above, Te Protejo submits reports on other situations that may violate or threaten the rights of children and adolescents (in environments different from the digital ones) to the National Institute of Family Welfare (ICBF) and to the Directorate of Protection and Special Services (DIPRO) of the National Police.

### Relationship with hosting providers:

Te Protejo has two hosting providers as partners and together with Red PaPaz acts as a point of contact between the service providers, the Ministry of ICT, and the Authorities, organizing work groups, for the development of strategies, improvements, and identification of inconveniences for notice and takedown procedures. However, in Colombia it has not been possible to reach an agreement on how the hotline, authorities, and service providers should handle material hosted in Colombia.

Te Protejo does not send notifications or removal requests to host providers directly. These notifications have been requested by hosting providers to be sent by the authorities in case this happens.

### Other content dealt with:

Te Protejo also receives reports on commercial sexual exploitation of minors:

- Colombian Constitution (art. 44) and the Childhood and Adolescence Code (Art. 20 Num, 4) set forth the duty to protect children and adolescents against all forms of violence and highlight that the rights of this population prevail.
- Law 1620 of 2013 creates the National System of School Socialization, which seeks to promote and strengthen school socialization, education for citizenship and the exercise of sexual and reproductive rights of students and members of the school community and create mechanisms that allow the promotion, prevention, care, detection, and management of situations that affect school socialization.
- The Colombian Criminal Code in its Chapter IV (articles 213 to 219-C) sets forth the crimes of sexual exploitation and defines the penalties and circumstances of punitive aggravation of such crimes.
- Laws 679 of 2001 and 1336 of 2009 establish protection measures against exploitation, pornography, sex tourism and other forms of sexual abuse with persons under 18 years of age and establishes prohibitions, duties and administrative sanctions for providers or servers, administrators, and users of global information networks.

### Cyberbullying of minors

- The Colombian Constitution (art. 44) and the Childhood and Adolescence Code (Art. 20 Num, 4) set forth the duty to protect children and adolescents against all forms of violence and highlight that the rights of this population prevail.
- Law 1620 of 2013 creates the National System of School Socialization, which seeks to promote and strengthen school socialization, education for citizenship and the exercise of sexual and reproductive rights of students and members of the school community and create mechanisms that allow the promotion, prevention, care, detection, and management of situations that affect school socialization.
- Law 1732 of 2014 regulates the implementation of the curriculum of Education for Peace in all educational institutions of the country, both official and private, and aims to promote the process of appropriation of knowledge and skills related to peace around 3 topics: Culture of Peace, Education for Peace and Sustainable Development
- Law 294 of 1996 establishes provisions aimed at preventing, attending, and punishing domestic violence.

- Decree 1075 of 2015 the National System of School Socialization
- Decree 1075 of 2015 regulates the implementation of the curriculum of Education for Peace in all educational institutions of the country, both official and private, and aims to promote the process of appropriation of knowledge and skills related to peace around 3 topics: Culture of Peace, Education for Peace and Sustainable Development, School bullying

#### Sale of tobacco, alcohol, and other drugs to minors

- The Colombian Constitution (art. 44) and the Childhood and Adolescence Code (Art. 20 Num, 3) set forth the duty to protect children and adolescents against all forms of violence and highlight that the rights of this population prevail.
- Law 124 of 1994 establishes the prohibition of the sale of alcoholic beverages to children and adolescents and Law 1801 of 2016 prohibit the sale of all psychoactive substances and defines the penalties for the sale, sale, or supply of such substances to minors.
- Colombia is part of the Framework Convention for Tobacco Control - WHO FCTC, introduced to the domestic legislation through Law 1109 of 2006 and implemented through Law 1335 of 2009 that established measures for tobacco regulation and CCTs.
- Scientific evidence has not determined that ENDS and SSSN are an alternative for smoking cessation and therefore do not have an INVIMA registry to be used as drugs or medical devices (17).

#### What age constitutes a child:

In Colombia, any person under 18 is considered a minor and is entitled to special protection under the Constitution. In addition, Law 1098 of 2006 defines that children are minors under 12 years, while adolescents are minors above 12 years and under 18 years. CSAM applies to all minors. However, minors over 14 years can marry and can provide consent for sexual intercourse.

Content Type	Legal Status	Actions Taken	Comments/Explanations
Drawings/manga/artistic interpretations of CSAM	Illegal	Notice to LEA. LEA sends NTD to HPs.	This content is illegal due to its inappropriateness, but it does not constitute a crime because it does not depict real people. It only constitutes administrative sanctions for providers if they do not apply the blocking measure.
Digitally generated CSAM/realistic images representing a minor engaged in sexually explicit conduct	Illegal	Notice to LEA. LEA sends NTD to HPs.	This content is illegal due to its inconvenience, but it does not constitute a crime because it does not depict real people. It only constitutes administrative sanctions for providers if they do not apply the blocking measure.
A minor appearing to be an adult engaged in sexually explicit conduct	Illegal	Notice to LEA. LEA sends NTD to HPs.	In Colombia, all sexual content suggested or explicit with minors under 18 years of age is considered CSAM even if they have the appearance of adults.

			If the content is hosted in Colombia, LEA refer it to the Public Prosecutor's Office, so that the opening of criminal notice and subsequent investigation and dismantling of the content is ordered.
<b>An adult person appearing to be a minor engaged in sexually explicit conduct</b>	Illegal (dependent on context)	Notice to LEA. LEA sends NTD to HPs.	In these cases, if it is not possible to identify the age of the person, the law in Colombia orders that the lower age must be applied, favourable to the protection of those under 18 years of age. In other words, the content would be classified as CSAM if the age of majority of those involved in the content cannot be determined.
<b>Child grooming</b>	Not illegal	Notice to LEA.	In Colombia, grooming is not regulated as a crime. However, the law adapts this situation to behaviours that are established in criminal law, such as illegal restraint, abusive sexual acts, and de facto injury.
<b>Sexual extortion of children or soliciting children for sexual purposes</b>	Illegal	Notice to LEA.	
<b>Apparent self-generated sexual material</b>	Illegal	Notice to LEA. LEA sends NTD to HPs.	If the content is not hosted in the country, LEA publishes the content in the unified list of URLs with CSAM and notifies the providers to apply the preventive blocking measure. If the content is hosted in Colombia, LEA transfers the report to the Public Prosecutor's Office, so that the opening of criminal notice and subsequent investigation and dismantling of the content is ordered.
<b>Sexualised modelling or posing</b>	Illegal	Notice to LEA. LEA sends NTD to HPs.	To classify this kind of content in Colombia, the 'Classification criteria document for pages with CSAM' is used as an auxiliary instrument of justice, where one of the criteria to identify this content is "the images or videos of girls, boys and adolescents exposed in underwear or swimwear, supposedly as models, suggesting sexual or erotic purposes." That is to say that in this classification, what is taken into account is the sexual suggestion independent of whether it is modelling or posing. For these contents, Colombia adapted the definition of "sexualized" from the Guide of Terminological Orientations for the protection of girls, boys and adolescents against exploitation and sexual abuse and is defined as: "Images of girls, boys and adolescents posing half-naked or naked with an emphasis on their sexualization." If the content is not hosted in the country, LEA publishes the content in the unified list of URLs with CSAM and notifies the providers to apply the preventive blocking measure. If the content is hosted in Colombia, LEA transfers the case to the Public Prosecutor's Office, so that the opening of criminal notice and subsequent investigation and dismantling of the content is ordered.
<b>Sexualised images of children</b>	Illegal	Notice to LEA. LEA sends NTD to HPs.	If the content is not hosted in the country, LEA publishes the content in the unified list of URLs

			with CSAM and notifies the providers to apply the preventive blocking measure. If the content is hosted in Colombia, LEA transfers the case to the Public Prosecutor's Office, so that the opening of criminal notice and subsequent investigation and dismantling of the content is ordered.
<b>Text depictions of CSAM</b>	Not illegal	None	
<b>Fictional text depictions of CSAM</b>	Not illegal	None	
<b>Praise of paedophilia or CSA</b>	Not illegal	None	
<b>Manual on CSA</b>	Not illegal	None	
<b>Declaration of committing CSA</b>	Not illegal	None	

Context	Legal Status	Actions Taken	Comments/explanation
<b>Images in a medical context</b>	Not illegal but treated as CSAM.	Notice to LEA. LEA sends NTD to HPs.	Legality depends on the context. If an image is taken out of the medical context it is illegal (for example, medical context images on pornography pages).
<b>Non-explicit images in a series of images that contain CSAM</b>	Not illegal		The content analysis process is done individually on each image or video and focuses specifically on sexual content, which is why the series before or after the abuse are only taken into account to identify the age of the victim, but they are not treated as CSAM.
<b>Non-explicit images that have comments or captions of a sexual nature attached to them</b>	Not illegal	Notice to LEA.	These comments are not considered illegal, but they are inconvenient. When comments are found on social networks, they are sent to the social network through collaboration and trust channels and to LEA to prevent possible harassing behaviour. These reports are processed by the Cyberbullying categories.

Content Location	Accessibility by Law	Actions Taken	Comments/explanation
Private site types (Password protected)	Allowed to access. Allowed to send NTDs	Notice to LEA. LEA sends NTD to HPs.	Access to private messages is not allowed. However, Te Protejo collects the greatest amount of evidence on the offer or exchange of CSAM and LEA is informed so that they can start the investigation.
Peer to peer (torrent, emule, Kat)	Allowed to access. Allowed to send NTDs	Notice to LEA. LEA sends NTD to HPs.	Access to private messages is not allowed. However, Te Protejo collects the greatest amount of evidence on the offer or exchange of CSAM and LEA is informed so that they can start the investigation.
Dropbox/cloud/similar file hosting services	Allowed to access. Allowed to send NTDs	Notice to LEA. LEA sends NTD to HPs.	Access to private messages is not allowed. However, Te Protejo collects the greatest amount of evidence on the offer or exchange of CSAM and LEA is informed so that they can start the investigation.
Tor/Onion	Allowed to access. Allowed to send NTDs	Notice to LEA. LEA sends NTD to HPs.	Te Protejo can access the Tor/Onion content through the Atlas-Voyager platform. This platform allows safe navigation on the dark web, capturing online data sources allowing analysts to find new evidence, discover trends and dynamics of CSAM in the world.
Livestreamed CSE/CSA	Allowed to access. Allowed to send NTDs	Notice to LEA. LEA sends NTD to HPs.	In these cases, immediate notice is given to LEA to start the investigation.
File Transfer protocol (Ftp://)	Allowed to access. Allowed to send NTDs	Notice to LEA. LEA sends NTD to HPs.	Access to private messages is not allowed. However, if evidence is obtained about the offer or exchange of CSAM by this means, LEA is informed so that they can start the investigation.
Social media accounts	Allowed to access. Allowed to send NTDs	Notice to LEA. LEA sends NTD to HPs.	Access to private messages is not allowed. However, if evidence is known about a profile in which CSAM is offered or exchanged, Te Protejo collects the greatest amount of evidence and informs LEA so that they can initiate the investigation and the social network through the collaboration channels.
Email	Allowed to access. Allowed to send NTDs	Notice to LEA. LEA sends NTD to HPs.	Access to private messages is not allowed. However, Te Protejo collects the greatest amount of evidence on the offer or exchange of CSAM and LEA is informed so that they can start the investigation.
Usenet	Allowed to access. Allowed to send NTDs	Notice to LEA. LEA sends NTD to HPs.	Access to private messages is not allowed. However, Te Protejo collects the greatest amount of evidence on the offer or exchange of CSAM and LEA is informed so that they can start the investigation.
Messengers (Telegram, WhatsApp)	Allowed to access. Allowed to send NTDs	Notice to LEA. LEA sends NTD to HPs.	Access to private messages is not allowed. However, if evidence is known about a channel or profile of Telegram/WhatsApp/Snapchat, in which CSAM is offered or exchanged, Te Protejo collects the greatest amount of evidence and informs LEA so that the investigation also occurs, and a notice is sent to the platform through the channels of collaboration.

## *Denmark – AnmeldDet*

### **Legal basis for operation:**

MoU from Attorney General.

### **Relationship with Law enforcement:**

MoU with the National Cyber Crime Center (NC3) at the National Police. AnmeldDet forwards information to NC3 if the content is CSAM and is hosted in Denmark, if the site owner appears to be Danish or the victims in the material have links to Denmark. URLs of foreign hosted websites with CSAM is forwarded to NC3 to be included in the Danish blocking list.

### **Relationship with hosting providers:**

The hotline sends Notice and Takedown requests to the Danish hosting providers after having contacted LEA. If content is not removed within 72 hours, a reminder is sent until content is removed. Some hosting providers provide feedback when removal is underway or content is down, some others do not. The hotline checks if content is down, regardless of the hosting providers' feedback.

### **Other content dealt with:**

In addition to the illegal material, the hotline also classifies other forms of sexually abusive material with children, e.g., erotic posing pictures and everyday pictures with children in explicit pornographic contexts. In addition, pornographic stories where children have sex with adults. The hotline addresses the site owner with an appeal to remove the content.

### **What age constitutes a child:**

In Denmark, a person is a child until they turn 18. The age of sexual consent is 15 years, but it is forbidden to exploit persons under the age of 18 in pornographic material and in connection with prostitution.



Content Type	Legal status	Actions Taken	Comments/Explanations
Drawings/manga/artistic interpretations of CSAM	Not illegal	None	
Digitally generated CSAM/realistic images representing a minor engaged in sexually explicit conduct	Illegal	Notice to LEA. NTD to HPs.	Illegality is defined as "pornographic visual representations or the like of persons under 18 years of age."
A minor appearing to be an adult engaged in sexually explicit conduct	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	It is handled as CSAM if hotline staff find it very likely that the person is a minor. Such information is included in ICCAM, a notice is sent to LEA as well as to HP.
An adult person appearing to be a minor engaged in sexually explicit conduct	Not illegal	None	
Child grooming	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	"Child grooming" is not a term used in Danish law. But it is illegal for an adult to try to lure/bribe/force a child under 15 to partake in sexual interaction with the adult. It is also illegal to ask the child to take photos/video of him/herself in a sexualised context. Action depends on severity. Content may be removed by HPs. Sometimes judicial processing of reports by LEA.
Sexual extortion of children or soliciting children for sexual purposes	Illegal	Notice to LEA. NTD to HPs.	This is rarely reported to the hotline, but more often to the organization's helpline (Slet Det) Delete It.
Apparent self-generated sexual material	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	Self-generated material is not illegal for the child to produce and/or distribute. It is not illegal for people over the age of 15 to share their own pornographic material with a boy- or girlfriend. It is illegal for others to obtain, possess and distribute, because it is then considered as CSAM.
Sexualised modelling or posing	Not illegal (dependent on context)	Notice to LEA.	"Sexualised" in this context includes children posing in positions and/or with clothing/make-up that clearly imitates adult sexualised posing i.e., showing buttocks, bending over, putting finger in mouth etc. If genitalia are showing or if the child is engaged in real or imitated acts (i.e., intercourse, masturbation), the image is considered illegal. LEA logs the occurrence in their own system and in some cases notifies HPs. HPs sometimes remove material, but as it is not illegal, they are not obligated to do so.
Sexualised images of children	Not illegal (dependent on context)	Notice to LEA.	"Sexualised" in this context includes children posing in positions and/or with clothing/make-up that clearly imitates adult sexualised posing i.e., showing buttocks, bending over, putting finger in mouth etc. If genitalia are showing or if the child is engaged in real or imitated acts (i.e., intercourse, masturbation), the image is considered illegal. LEA logs the occurrence in their own system and in some cases notifies HPs. HPs sometimes remove material, but as it is not illegal, they are not obligated to do so.

<b>Text depictions of CSAM</b>	Not illegal (dependent on context)	None	A general text depiction of CSAM is not illegal under Danish law. There may be exceptions in cases where the text refers to actual crimes against "real" identifiable children.
<b>Fictional text depictions of CSAM</b>	Not illegal	None	
<b>Praise of paedophilia or CSA</b>	Illegal (dependent on context)	Notice to LEA.	If there is a positive mention of illegal sexual contact between adults and children, and this can be perceived as an invitation to perform it in reality, it may, after a specific assessment, be illegal.
<b>Manual on CSA</b>	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	
<b>Declaration of committing CSA</b>	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	The declaration of committing CSA on a specific child is illegal under Danish law. The general declaration of wishing to commit CSA is not illegal.

Context	Legal Status	Actions Taken	Comments/explanation
<b>Images in a medical context</b>	Not illegal but treated as CSAM.		Images in a medical context in a textbook are not considered illegal under Danish law. It is however considered illegal if the images are removed from their medical context and are placed on a website.
<b>Non-explicit images in a series of images that contain CSAM</b>	Not illegal but treated as CSAM.		Non-explicit images are not illegal even if the context is pornographic. However, the hotlines register this. A non-explicit image of a child will be illegal if it appears in a series where the same child appears in CSAM. The Danish hotline is lobbying to make the use of non-explicit pictures in a context of CSAM or adult porn illegal.
<b>Non-explicit images that have comments or captions of a sexual nature attached to them</b>	Not illegal & not treated as CSAM.		The Danish hotline is lobbying to make the comments or captions of a sexual nature attached to pictures of children illegal.

Content Location	Accessibility by Law	Actions Taken	Comments/Explanation
Private site types (Password protected)	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	The Danish hotline is not allowed to purchase access to private sites, but if a report includes a password, the hotline is allowed to use it.
Peer to peer (torrent, emule, Kat)	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	
Dropbox/cloud/similar file hosting services	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	
Tor/Onion	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	
Livestreamed CSE/CSA	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	
File Transfer protocol (Ftp://)	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	Occurs very rarely.
Social media accounts	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	
Email	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	
Usenet	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	Occurs very rarely.
Messengers (Telegram, WhatsApp)	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	

## Hotline Mandate

## Estonia – Vihjeliin

**Legal basis for operation:**

MoU with the Estonian Police and Border Guard Board.

**Relationship with Law enforcement:**

Vihjeliin has a MoU with the Estonian Police and Border Guard Board. According to the guidelines of the hotline and the MoU, the hotline sends reports related to sexual abuse acts including child trafficking to the LEA.

**Relationship with hosting providers:**

As per the above-mentioned MoU, the hotline does not notify hosting providers or send NTD requests.

**Other content dealt with:**

Child trafficking.

**What age constitutes a child:**

According to Estonian legislation a child is a person below the age of 18 years.

Content Type	Legal Status	Actions Taken	Comments/Explanations
Drawings/manga/artistic interpretations of CSAM	Illegal	Notice to LEA. LEA sends NTD to HPs.	
Digitally generated CSAM/realistic images representing a minor engaged in sexually explicit conduct	Illegal	Notice to LEA. LEA sends NTD to HPs.	
A minor appearing to be an adult engaged in sexually explicit conduct	Illegal	Notice to LEA. LEA sends NTD to HPs.	
An adult person appearing to be a minor engaged in sexually explicit conduct	Not illegal	None	

<b>Child grooming</b>	Illegal	Notice to LEA. LEA sends NTD to HPs.	The law uses a stipulation of agreeing to meet for sexual purposes with the child. Proposing to meet a person of less than 18 years of age who was not capable of comprehending the situation, or a person of less than 14 years of age, to commit an offence of sexual nature is prohibited by the Penal Code.
<b>Sexual extortion of children or soliciting children for sexual purposes</b>	Illegal	Notice to LEA. LEA sends NTD to HPs.	The law uses the term “enticement” and stipulates that handing over, displaying or making otherwise pornographic works or reproductions thereof knowingly available to a person of less than 14 years of age, or showing sexual abuse to such person or engaging in sexual intercourse in the presence of such person or knowingly sexually enticing such person in any other manner/erotic situation is punishable.
<b>Apparent self-generated sexual material</b>	Illegal	Notice to LEA. LEA sends NTD to HPs.	
<b>Sexualised modelling or posing</b>	Illegal (dependent on context)	Notice to LEA. LEA sends NTD to HPs.	The law does not include terms “sexualised modelling” or “posing.” The law stipulates erotic situation but does not specify the term. The law stipulates that it is prohibited in case a person is less than 14 years of age.
<b>Sexualised images of children</b>	Illegal (dependent on context)	Notice to LEA. LEA sends NTD to HPs.	The law stipulates that it is prohibited in the case a person is less than 14 years of age.
<b>Text depictions of CSAM</b>	Illegal	Notice to LEA. LEA sends NTD to HPs.	
<b>Fictional text depictions of CSAM</b>	Illegal	Notice to LEA. LEA sends NTD to HPs.	
<b>Praise of paedophilia or CSA</b>	Not illegal	None	
<b>Manual on CSA</b>	Illegal	Notice to LEA. LEA sends NTD to HPs.	
<b>Declaration of committing CSA</b>	Illegal	Notice to LEA. LEA sends NTD to HPs.	

Context	Legal Status	Actions Taken	Comments/explanation
<b>Images in a medical context</b>	Not illegal		These images are not illegal if these are provided in medical context.
<b>Non-explicit images in a series of images that contain CSAM</b>	Treated as CSAM.	Notice to LEA.	If these images are part of the series which is accessible by the hotline and assessed as illegal, then these images are treated as illegal.
<b>Non-explicit images that have comments or captions of a sexual nature attached to them</b>	Treated as CSAM.	Notice to LEA.	

Content Location	Accessibility by Law	Actions Taken	Comments/explanation
Private site types (Password protected)	Not allowed to access or send NTDs.	Notice to LEA.	In case the hotline receives such reports, these will be forwarded to the LEA.
Peer to peer (torrent, emule, Kat)	Not allowed to access or send NTDs.	Notice to LEA.	The hotline sends reports which refer to Peer to Peer to LEA for assessment.
Dropbox/cloud/similar file hosting services	Not allowed to access or send NTDs.	Notice to LEA.	The hotline sends reports which refer to Peer to Peer to LEA for assessment.
Tor/Onion	Allowed to access.	Notice to LEA.	
Livestreamed CSE/CSA	Allowed to access.	Notice to LEA.	
File Transfer protocol (Ftp://)	Not allowed to access or send NTDs.	Notice to LEA.	The hotline sends reports containing links to social media accounts to LEA for assessment. If the accounts are public and the hotline sees the content, it is assessed, and a report is sent to LEA in case of CSAM.
Social media accounts	Not allowed to access or send NTDs.	Notice to LEA.	The hotline sends reports containing links to social media accounts to the LEA for assessment. If the accounts are public and the hotline sees the content, it is assessed, and a report is sent to LEA in case of CSAM.
Email	Not allowed to access or send NTDs.	None	
Usenet	Not allowed to access or send NTDs.	None	
Messengers (Telegram, WhatsApp)	Not allowed to access or send NTDs.	None	

## *Finland - Save the Children* Finland Finnish Hotline

### **Legal basis for operation:**

Finnish Hotline has a MOU with the LEA. The work of the hotline is within what is allowed by the Criminal Code. The Criminal Code's section on sexual offences is being amended.

### **Relationship with Law enforcement:**

Finnish hotline has a MOU with the LEA. The Finnish hotline is in contact with the LEA's child sexual exploitation team several times a week by phone and email. The hotline forwards (by email) reports assessed as illegal (e.g., CSAM, grooming) in addition to material that is assessed as doubtful. If the hotline receives other material assessed as illegal (e.g., material depicting adults and animals in sexual context or other forms of severe violence), it is also forwarded to the CSE-team.

### **Relationship with hosting providers:**

The Finnish Hotline can send a notification to a hosting provider but cannot share URLs containing illegal material. The hotline instructs the hosting provider to contact the LEA.

### **Other content dealt with:**

CSAM (Criminal Code, Chapter 17, Section 18 - Distribution of a sexually offensive picture, Section 18(a) - Aggravated distribution of a sexually offensive picture depicting a child, Section 18(b) - Illegal exhibition or distribution of video programmes to a minor, Section 19 - Possession of a sexually offensive picture depicting a child, Chapter 20, Section 8(c) – Following of a sexually offensive performance of a child). Grooming (Criminal Code, Chapter 20, Section 8(b) –Solicitation of a child for sexual purposes). In addition, the hotline receives reports if a child's naked picture has spread online and reports on child trafficking for sexual purposes (Criminal Code Chapter 25, Section 3 Trafficking in human beings, Section 3(a) - Aggravated trafficking in human beings). Link to an unofficial translation of the Criminal Code, which does not contain updates after 2015: <https://www.finlex.fi/fi/laki/kaannokset/1889/en18890039.pdf>

### **What age constitutes a child:**

A child is person below the age of 18 years. The age of consent regarding sexual activity is 16 years. There are special regulations that apply to children 16-18 years of age.

Content Type	Legal Status	Actions Taken	Comments/Explanations
Drawings/manga/artistic interpretations of CSAM	Not illegal	None	
Digitally generated CSAM/realistic images representing a minor engaged in sexually explicit conduct	Not illegal	None	The Ministry of Justice in Finland issued a draft (in July 2020) to the Minister of Justice to suggest amendments to the Criminal Code regarding sexual offences. The Finnish hotline gave a statement regarding the suggested changes in the legislation. The hotline encouraged the legislators to consider whether to criminalize this kind of material.
A minor appearing to be an adult engaged in sexually explicit conduct	Illegal	Notice to LEA. LEA sends NTD to HPs.	If the hotline has reasonable grounds to assume that the person in the picture is below the age of 18, it forwards the material to the LEA for further investigation. If the material is hosted in Finland, the hotline sends an email to inform the HP about the illegal material. The HP is requested to contact the LEA for further information. The hotline is not allowed to forward URLs to the HP.
An adult person appearing to be a minor engaged in sexually explicit conduct	Not illegal	None	
Child grooming	Illegal	Notice to LEA.	If the hotline has enough information on the child, it makes a child welfare report to the social services.
Sexual extortion of children or soliciting children for sexual purposes	Illegal	Notice to LEA.	If the hotline has enough information on the child, it makes a child welfare report to the social services.
Apparent self-generated sexual material	Illegal	Notice to LEA. LEA sends NTD to HPs.	The Criminal Code does not sufficiently define a sexually offensive picture of a child. The Finnish hotline has given a statement in this regard for the upcoming amended Criminal Code.
Sexualised modelling or posing	Not illegal (dependent on context)		The Criminal Code does not sufficiently define a sexually offensive picture of a child. The Finnish hotline has given a statement in this regard for the upcoming amended Criminal Code.
Sexualised images of children	Not illegal (dependent on context)		The Criminal Code does not sufficiently define a sexually offensive picture of a child. The Finnish hotline has given a statement in this regard for the upcoming amended Criminal Code.
Text depictions of CSAM	Not illegal	None	
Fictional text depictions of CSAM	Not illegal	None	
Praise of paedophilia or CSA	Not illegal	None	
Manual on CSA	Not illegal	Notice to LEA.	Depending on the context, the hotline can send material like this to the LEA for their information, even if not assessed as illegal.
Declaration of committing CSA	Not illegal (dependent on context)	Notice to LEA.	



Context	Legal Status	Actions Taken	Comments/explanation
Images in a medical context	Not illegal & not treated as CSAM.		If the hotline receives a report on this type of material, it will assess it, but images in medical context are not illegal.
Non-explicit images in a series of images that contain CSAM	Not illegal & not treated as CSAM.		These types of images are not sufficiently covered in the current Criminal Code. The Finnish hotline has given a statement in this regard for the upcoming amended Criminal Code suggesting that the legality of these images should be further considered.
Non-explicit images that have comments or captions of a sexual nature attached to them	Not illegal	Notice to LEA.	The hotline would forward these types of reports to the LEA for their assessment.

Content Location	Accessibility by Law	Actions Taken	Actions Taken
Private site types (Password protected)	Not allowed to access or send NTDs.	Notice to LEA.	All reports that the hotline cannot access are forwarded to the LEA.
Peer to peer (torrent, emule, Kat)	Not allowed to access or send NTDs.	Notice to LEA.	All reports that the hotline cannot access are forwarded to the LEA.
Dropbox/cloud/similar file hosting services	Allowed to access. Allowed to send NTDs.	Notice to LEA. LEA sends NTD to HPs.	If the site is not password-protected and does not require downloading, the hotline will assess it and forward all illegal material to LEA. All reports the hotline cannot access are forwarded to the LEA.
Tor/Onion	Allowed to access.	Notice to LEA.	Illegal material is forwarded to LEA.
Livestreamed CSE/CSA	Allowed to access.	Notice to LEA.	Illegal material is forwarded to LEA.
File Transfer protocol (Ftp://)	Unknown		
Social media accounts	Allowed to access. Allowed to send NTDs.	Notice to LEA. LEA sends NTD to HPs.	Public social media accounts publishing CSAM/CSEM are reported to the LEA and in some cases the social media platform for removal. If the hotline cannot access the report (e.g., private account), it is forwarded to the LEA for assessment.
Email	Allowed to access.	Notice to LEA.	Illegal material is forwarded to LEA.
Usenet	Allowed to access.	Notice to LEA.	If the hotline has access to the content, the hotline will assess it and forward illegal material to LEA.
Messengers (Telegram, WhatsApp)	N/A		

## *France - Point de Contact*

### **Legal basis for operation:**

MoU with LEA.

### **Relationship with Law enforcement:**

MoU with LEA since 2010. The hotline forwards to the LEA (PHAROS, reporting platform of France's national cybercrime investigation unit) any type of content within its remit assessed as manifestly illegal, no matter the hosting country. LEA may request further feedback. The MoU stipulates that the hotline shall forward content to the LEA when in doubt as per the legality of content. LEA and the hotline are regularly in contact and discuss various topics (legal assessment of specific content, handling of specific reports, identification of trends, statistics, technological developments) by phone and email, even daily, while operational meetings either at the hotline or at the LEA headquarters take place at least once per year. Reports are forwarded to LEA via a dedicated LEA reporting platform. The hotline is the first LEA's professional reporter in terms of volume and quality.

### **Relationship with hosting providers:**

Three to six hours after having forwarded a report to the LEA, the hotline sends Notice and Takedown requests to the French hosting providers. If content is not removed within 48 hours, a reminder is sent until content is removed. Some hosting providers provide feedback when removal is underway or content is down, others do not. The hotline checks if content is down, regardless of the hosting providers' feedback. The hotline is a trusted partner of its members (French hosting providers and social media platforms operating in France) and uses dedicated reporting channels. The hotline members are encouraged to contact the hotline should they need assistance with legal assessment of content reported directly to them. Operational meetings take place between the hotline and its members occasionally.

### **Other content dealt with:**

- CSAM/CSEM, Article 227-23 of the French Criminal Code
- Child grooming activities, Article 227-22-1 of the French Criminal Code
- Solicitation of children for sexual purposes (sexual extortion of children) and Sexual harassment, Article 222-33-2-2 of the French Criminal Code
- Violent content, pornographic content, content inciting to terrorism, content seriously violating human dignity, content inciting minors to play games putting them in physical danger, that is accessible to minors, 227-24 French Criminal Code
- Hate speech, Articles 24, 33 and 48 of the Act of 29 July 1881 on Freedom of the press

- Terrorist propaganda, Article 421-2-5 of the French Criminal Code and Incitement to bomb-making, Article 322-6-1 of the French Criminal Code
- Incitement to suicide, Articles 223-13 and 223-14 of the French Criminal Code
- Procuring (prostitution), Act n° 2016-444 of 13 April 2016
- Praise of war crimes/crimes against humanity, Article 24 of the Act of 29 July 1881 on Freedom of the press

#### What age constitutes a child:

Child/minor is any person below the age of 18 years, Article 388 of the French Civil Code.

Content Type	Legal Status	Actions Taken	Comments/Explanations
Drawings/manga/artistic interpretations of CSAM	Illegal	Notice to LEA. NTD to HPs.	This type is not defined by the law but is found in the jurisprudence.
Digitally generated CSAM/realistic images representing a minor engaged in sexually explicit conduct	Illegal	Notice to LEA. NTD to HPs.	This type is not defined by the law but is found in the jurisprudence.
A minor appearing to be an adult engaged in sexually explicit conduct	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	It is handled as CSAM if there is evidence that the depicted person is a minor (age confirmed by LEA or by a partner hotline or the picture is a part of a series where the victim is clearly underage). Such information is included in ICCAM, in the notice to LEA as well as to HP. If there is doubt as per the depicted person's age, the context may guide the assessment.
An adult person appearing to be a minor engaged in sexually explicit conduct	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	This case is defined by the law, which stipulates that "The provisions in the present article [227-23 of the French Criminal Code] shall also apply to pornographic images of any person whose physical appearance is that of a minor, unless it is proven that the person was over 18 years of age on the day the image was taken or recorded." Therefore, it is handled as CSAM if there is no evidence that the person is over 18 years old and if the person can easily be perceived as a minor, so a notice is sent to LEA and HPs.
Child grooming	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	Child grooming is defined by the law as "the act of sexual proposals by an adult to a minor under 15 years of age or to a person presenting themselves as such, by using a digital public communication service," while the punishment is more severe if a meeting is arranged. Child grooming is usually reported directly by the victim or their parents/carers. The age of the minor cannot always be assessed. Another typical case is reported accounts on social media that invite children to exchange CSAM in private messaging or invite children to contact the account owner for modelling purposes. In the majority of these cases, the hotline cannot assess any content online. The assessment is based on the context (description of the report, activity of the account on social media). If the report is assessed as illegal, the hotline specifies to LEA and HPs that no assessment of content took place, that the reported activity/behaviour seems suspicious and probably illegal. The hotline also encourages the victim, if the report is not anonymous, to be addressed to LEA. If child grooming is accompanied by CSAM, both are reported to LEA and HPs and CSAM is uploaded to ICCAM.

<b>Sexual extortion of children or soliciting children for sexual purposes</b>	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	
<b>Apparent self-generated sexual material</b>	Illegal	None	There is no difference on how the hotline handles apparent self-generated and non-self-generated sexual material.
<b>Sexualised modelling or posing</b>	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	The terms "sexualised" or "sexual" are not found in the Article 227-23 of the French Criminal Code related to CSAM, however they are met in the jurisprudence and used by the LEA. Content of a sexual nature includes images of children, naked, semi-naked or clothed, with focus on genitalia or the nudity or in sexually explicit positions, wearing age-inappropriate clothing or with age-inappropriate objects suggesting a sexually explicit setting. This excludes a priori images of nudism or naturism without a focus on the body of the child, as well as other images of naked and semi-naked children in a non-sexualised context. "Sexualised child modelling" often refers to images/videos produced in a professional setting (professional studio or professional shooting outdoors with the logo of the agency attached) while "sexualised child posing" is content produced in a non-professional environment.
<b>Sexualised images of children</b>	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	As in the case of sexualised modelling or posing, content of this category is of a sexual nature. While they are handled the same way as CSAM, the difference in practice is that these pictures were initially produced in a non-illegal context (such as pictures of children wearing a bikini, at the beach, in gymnastics, child nudism) but they have been altered/photoshopped (often cropped so that focus is on genitalia/nudity, sexualised text or objects are added) in order to be of a sexual nature.
<b>Text depictions of CSAM</b>	Unknown		
<b>Fictional text depictions of CSAM</b>	Not illegal	None	
<b>Praise of paedophilia or CSA</b>	Not illegal	None	
<b>Manual on CSA</b>	Illegal	Notice to LEA. NTD to HPs.	
<b>Declaration of committing CSA</b>	Illegal	Notice to LEA. NTD to HPs.	

Context	Legal Status	Actions Taken	Comments/explanation
Images in a medical context	Not illegal		As such, these images are not illegal. Legality depends on the context. If a picture appears in another non-medical context, sexualising the child, it is illegal. If it remains in the medical context, it is not sexual, and thus not illegal.
Non-explicit images in a series of images that contain CSAM	Treated as CSAM.	Notice to LEA. NTD to HPs.	If the hotline has access to the series or is informed that the image is part of a series, the image is assessed as illegal. Series means that the illegal activity is depicted in several pictures and some of them (if assessed separately could not justify illegality) become illegal because of information available on other illegal pictures of the same series.
Non-explicit images that have comments or captions of a sexual nature attached to them	Dependent on context	Notice to LEA. NTD to HPs.	Sexualised comments attached to/added on a picture/video make this content illegal (see sexualised images of children). Comments/titles on a forum/page referring to and sexualising a picture/video but not attached to it are not a priori illegal.

Content Location	Accessibility by Law	Actions Taken	Comments/explanation
Private site types (Password protected)	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	Including online gaming chat. If illegal, notice to LEA and HPs.
Peer to peer (torrent, emule, Kat)	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	If illegal, notice to LEA and HPs.
Dropbox/cloud/similar file hosting services	Not allowed to access or send NTDs.		If illegal, notice to LEA and HPs.
Tor/Onion	Allowed to access.	Notice to LEA.	The hotline is allowed to access Tor and if reported content is illegal, it is forwarded to LEA. Often a URL accessible only on Tor (.onion) contains CSAM accessible on the clear web. In this case, CSAM is traced and is forwarded to LEA/HPs/ICCAM.
Livestreamed CSE/CSA	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	If illegal, notice to LEA and HPs.
File Transfer protocol (Ftp://)	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	If illegal, notice to LEA and HPs.
Social media accounts	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	Public social media accounts publishing CSAM/CSEM are reported to the LEA and the social media platform for removal. Public or

			private social media accounts that are reported to the hotline as publishing CSAM/CSEM or exchanging CSAM/CSEM in private or committing child grooming or sextortion are also reported to the LEA and the social media platform for investigation and possible removal/blocking depending on the circumstances (see child grooming and soliciting children for sexual purposes).
<b>Email</b>	Not allowed to access or send NTDs.		None.
<b>Usenet</b>	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	If illegal, notice to LEA and HPs.
<b>Messengers (Telegram, WhatsApp)</b>	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	Access to private messaging is not allowed to the hotline. However, if Telegram/WhatsApp/Snapchat have been reported as exchanging CSAM/CSEM in private or committing child grooming or sextortion, they are reported to the LEA and the platform for investigation and possible removal/blocking depending on the circumstances (see child grooming and soliciting children for sexual purposes).

## *Germany - eco.*

### **Legal basis for operation:**

Generally, everybody can report illegal content. Regarding CSAM, the law prohibits everybody from distributing and obtaining this kind of content. But there is an exception which allows the procurement of such content to acts which exclusively serve the performance of:

1. state functions
2. tasks resulting from agreements with a competent government agency or
3. official or professional duties.

eco has a MoU with the federal police which allows eco's work under this exception.

### **Relationship with Law enforcement:**

eco has an MoU with the federal police (BKA) and works closely together with them. Meetings and quick exchanges occur regularly. eco sends reports about child sexual abuse material under the criminal code to the federal police. This material contains:

- a) sexual acts performed by, on or in the presence of a minor
- b) the reproduction of a minor posing
- c) the sexually provocative reproduction of a child's bare genitalia or bare buttocks

### **Relationship with hosting providers:**

eco is the internet industry association with over 1000 members. Most German ISPs (hosters, access providers etc.) are members. The hotline was found due to members initiative. There are several opportunities for direct contact with the ISPs, e.g., there is a competence/task group which meets several times a year and exchanges information about trends in abuse handling. The hotline sends NTDs to HPs. Depending on the cases, some HPs give feedback and some just remove the content.

### Other content dealt with:

§§ 4 and 5 Interstate Treaty on the Protection of Minors in the Media (JMStV)

(Content endangering youth and impairing development) as well as their corresponding criminal law regulations

➤ §§ 184 et seq. German Criminal Code (StGB) (freely accessible adult pornography; violent, animal, child, and juvenile pornography)

➤ §§ 86, 86a StGB (distribution of symbols and propaganda materials of unconstitutional organizations)

➤ § 130 German Criminal Code (StGB) (Incitement to hatred)

➤ § 130a German Criminal Code (StGB) (Attempting to cause the commission of offences by means of publication)

§ 131 German Criminal Code (StGB) (Dissemination of extreme depictions of violence)

§ 174 German Criminal Code (StGB) (Grooming)

§ 201a German Criminal Code (StGB) (Distributing pictures of naked minors in return for payment)

§§ 129, 129a German Criminal Code (StGB) (Supporting or advertising for criminal or terrorist organizations)

§ 111 German Criminal Code (StGB) (Public incitement to crime)

§ 7 Act Against Unfair Competition (UWG) (Unauthorized sending of

advertising emails and newsletters)

### What age constitutes a child:

The Law states that a person under 14 years of age is a child. From 14 to under 18 they are juveniles. The child sexual abuse laws apply to all minors.

Content Type	Legal Status	Actions Taken	Comments/Explanations
Drawings/manga/artistic interpretations of CSAM	Illegal	Notice to LEA. NTD to HPs.	There is no legal difference between fictional or real content in Germany.
Digitally generated CSAM/realistic images representing a minor engaged in sexually explicit conduct	Illegal	Notice to LEA. NTD to HPs.	
A minor appearing to be an adult engaged in sexually explicit conduct	Illegal	Notice to LEA. NTD to HPs.	
An adult person appearing to be a minor engaged in sexually explicit conduct	Illegal	Notice to LEA. NTD to HPs.	It depends on the individual case. "Appearing" means the setting, the appearance must be intentional.



<b>Child grooming</b>	Illegal	Notice to LEA. NTD to HPs.	Grooming usually happens in 1on1 chats, therefore a notice and takedown is not always possible.
<b>Sexual extortion of children or soliciting children for sexual purposes</b>	Illegal	Notice to LEA. NTD to HPs.	
<b>Apparent self-generated sexual material</b>	Illegal	Notice to LEA. NTD to HPs.	Content that is self-generated is also illegal if it is accessible to others. The creator might not be liable.
<b>Sexualised modelling or posing</b>	Illegal	Notice to LEA. NTD to HPs.	The law states: whereby pornographic material (section 11 (3)) is deemed to be child pornography if it relates to the reproduction of a child in a state of full or partial undress in an unnaturally sexual pose or the sexually provocative reproduction of a child's bare genitalia or bare buttocks.
<b>Sexualised images of children</b>	Illegal (dependent on context)	NTD to HPs.	This really depends on the content. Images that show minors posing are illegal (according to German media law) and must be removed. If they are sexualised by context, so sexual comments on images this might be illegal or harmful to children and thus be removed.
<b>Text depictions of CSAM</b>	Illegal	Notice to LEA. NTD to HPs.	
<b>Fictional text depictions of CSAM</b>	Illegal	Notice to LEA. NTD to HPs.	
<b>Praise of paedophilia or CSA</b>	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	If "praise" means advertising content, it is illegal. If it is just an unspecific endorsement, it is not necessarily illegal, but if it is a specific endorsement, it can be illegal under another law.
<b>Manual on CSA</b>	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	It depends on the content of the manual. If there is CSAM content or a clear incitement to crimes, it is illegal.
<b>Declaration of committing CSA</b>	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	It depends on the content. Detailed descriptions of the CSA might be illegal.

Context	Legal Status	Actions Taken	Comments/explanation
<b>Images in a medical context</b>	Not illegal and not treated as CSAM.		It has to be just for this cause and may not be removed from the context.
<b>Non-explicit images in a series of images that contain CSAM</b>	Dependent on the content/context.	Notice to LEA. NTD to HPs.	If it includes children posing fully or partly clothed, the hotline considers it CSAM and reports it to the HP. Otherwise, it is not illegal and outside hotline remit.
<b>Non-explicit images that have comments or captions of a sexual nature attached to them</b>	Dependent on the content/context.	Notice to LEA. NTD to HPs.	The action depends on the case. If the text is explicit, it might be considered as text CSAM, and could be harmful to minors. If so, the hotline informs the HP, otherwise it would be out of remit.

Content Location	Accessibility by Law	Actions Taken	Comments/explanation
Private site types (Password protected)	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	The hotline reports the content to LEA and to the HP for removal after a waiting period. Reminders are sent until takedown.
Peer to peer (torrent, emule, Kat)	Allowed to access.	Notice to LEA. NTD to HPs.	The hotline reports the content to LEA. Notice and takedown is not possible in these cases so no further action can be taken.
Dropbox/cloud/similar file hosting services	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	The hotline reports the content to LEA and to the HP for removal after a waiting period. Reminders are sent until takedown.
Tor/Onion	Allowed to access.	Notice to LEA.	The hotline reports the content to LEA. Notice and takedown is not possible in these cases so no further action can be taken.
Livestreamed CSE/CSA	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	The hotline reports the content to LEA and to the HP for removal after a waiting period. Reminders are sent until takedown.
File Transfer protocol (Ftp://)	Allowed to access. Allowed to send NTDs	Notice to LEA. NTD to HPs.	The hotline reports the content to LEA and to the HP for removal after a waiting period. Reminders are sent until takedown.
Social media accounts	Allowed to access. Allowed to send NTDs	Notice to LEA. NTD to HPs.	The hotline reports the content to LEA and to the HP for removal after a waiting period. Reminders are sent until takedown.
Email	Allowed to access.	Notice to LEA.	The hotline reports the content to LEA. Notice and takedown is not possible in these cases so no further action can be taken.
Usenet	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	The hotline reports the content to LEA and to the HP for removal after a waiting period. Reminders are sent until takedown.
Messengers (Telegram, WhatsApp)	Allowed to access.	Notice to LEA.	The hotline reports the content to LEA. Notice and takedown is not possible in these cases so no further action can be taken.

## *Germany - FSM*

### **Legal basis for operation:**

MoU with LEA, § 184b sec.5 no. 2 German Penal Code (StGB)

### **Relationship with Law enforcement:**

Excellent relationship, several meetings during the year to stay updated. MoU since 2007, renewed in 2011 and 2017 between the German hotlines (eco, jugendschutz.net, FSM), the Federal Criminal Police Office (BKA) and the Federal Review Board for Media Harmful to Minors (BPjM). The hotline forwards any kind of child and youth pornography hosted in Germany and in countries without an INHOPE hotline. Since 2013 there is also a Report to the Parliament from the Federal Government on the measures taken for the purpose of deleting CSAM online which proves the effectiveness of the cooperation between the hotlines, the BPjM and the BKA for the purpose of combating CSAM.

### **Relationship with hosting providers:**

FSM does NTD with German hosting providers for any kind of illegal content, not just CSAM. However, since eco is the association of ISPs, there is an agreement with eco to send complaints that are not related to CSAM to them first, to allow them to contact their members first. If this is not successful within a given timeframe, FSM contacts them.

### **Other content dealt with:**

§§ 4,5 Interstate treaty on the protection of minors and human dignity (JMStV) e.g., propaganda material, unconstitutional symbols, denying of holocaust, incitement to hatred, violation of human dignity, cruel or inhuman activities, glorification of war, animal pornography, violent pornography, child-and youth pornography, depiction of posing images of minors, indexed content, adult pornography, any other content harmful to minors.

### **What age constitutes a child:**

Person under 14 years, e.g., § 176 sec. 1 German Penal Code (StGB), § 1 no. 1 Youth Protection Act (JuschG)

Content Type	Legal Status	Actions Taken	Comments/Explanations
Drawings/manga/artistic interpretations of CSAM	Illegal	Notice to LEA. NTD to HPs.	
Digitally generated CSAM/realistic images representing a minor engaged in sexually explicit conduct	Illegal	Notice to LEA. NTD to HPs.	
A minor appearing to be an adult engaged in sexually explicit conduct	Illegal	Notice to LEA. NTD to HPs.	
An adult person appearing to be a minor engaged in sexually explicit conduct	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	
Child grooming	Illegal	None	The hotline does not handle child grooming reports. However, if we receive a reasonable report, we forward the information to LEA. Additionally we also take action against such content if it violates the Interstate Treaty on the protection of minors – JMStV (e.g., if it is distributed in public chats).
Sexual extortion of children or soliciting children for sexual purposes	Illegal	Notice to LEA. NTD to HPs.	
Apparent self-generated sexual material	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	In general illegal. If generated and shared by a minor only illegal under circumstances. If the material is shared online and the person appears to be a minor, FSM treats this as CSAM or youth pornography.
Sexualised modelling or posing	Illegal	Notice to LEA. NTD to HPs.	Posing images are CSAM if they depict the children in unnaturally sexualised poses, or they expose their naked buttocks or genitalia in a sexually provocative way. This material is considered CSAM under Sections 184b and 184c StGB, if it depicts unnaturally sexualized poses, or the sexually provocative reproduction of the naked buttocks or genitalia of children. An unnaturally sexualised posture is characterized by an atypical, inappropriate, artificial, or provocative character. For instance, representations of naked children with legs spread in paddling pools or bathtubs therefore do not fall under the criminal liability if they are of a reasonable, age-typical and therefore natural attitude of the child. It must be decided on a case-by-case basis whether there is an unnatural gendered posture, especially for the sexual arousal of the observer.
Sexualised images of children	Illegal	Notice to LEA. NTD to HPs.	
Text depictions of CSAM	Illegal	Notice to LEA. NTD to HPs.	
Fictional text depictions of CSAM	Illegal	Notice to LEA. NTD to HPs.	

<b>Praise of paedophilia or CSA</b>	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	
<b>Manual on CSA</b>	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	
<b>Declaration of committing CSA</b>	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	

Context	Legal Status	Actions Taken	Comments/explanation
Images in a medical context	Not illegal	None	
Non-explicit images in a series of images that contain CSAM	Not illegal	None	
Non-explicit images that have comments or captions of a sexual nature attached to them	Dependent on the context.		It depends on the circumstances. If the comment is sexual with a direct relation to the picture in question, it might be considered illegal. In a project with jugendschutz.net as the coordinator, FSM collects URLs within the "No Grey Zones" project

Content Location	Accessibility by Law	Actions Taken	Comments/explanation
<b>Private site types (Password protected)</b>	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	Sent to LEA if hosted in Germany or in a country without an INHOPE Hotline, inserted into ICCAM, NTD sent to HP.
<b>Peer to peer (torrent, emule, Kat)</b>	Allowed to access.	Notice to LEA.	FSM does not check or enter torrent or emule sites. However, it forwards every TOR URL to LEA according to an internal agreement.
<b>Dropbox/cloud/similar file hosting services</b>	Unknown		
<b>Tor/Onion</b>	Allowed to access.	Notice to LEA.	FSM does not check or enter torrent or emule sites. However, it forwards every TOR URL to LEA according to an internal agreement.
<b>Livestreamed CSE/CSA</b>	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	Sent to LEA if hosted in Germany or in a country without an INHOPE Hotline, inserted into ICCAM, NTD sent to HP.
<b>File Transfer protocol (Ftp://)</b>	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	Sent to LEA if hosted in Germany or in a country without an INHOPE Hotline, inserted into ICCAM, NTD sent to HP.
<b>Social media accounts</b>	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	Sent to LEA if hosted in Germany or in a country without an INHOPE Hotline, inserted into ICCAM, NTD sent to HP.
<b>Email</b>	N/A		
<b>Usenet</b>	N/A		
<b>Messengers (Telegram, WhatsApp)</b>	N/A		

## *Germany - jugendschutz.net*

### **Legal basis for operation:**

MoU with LEA, BPjM, eco and FSM

### **Relationship with Law enforcement:**

MoU with LEA and BPjM (Federal Review Board for Media Harmful to Minors) with all three German hotlines (newest updated version dates back to 2017). The hotline forwards to the LEA any type of content within its remit assessed as manifestly illegal, no matter the hosting country (regarding CSAM only if hosted in Germany, any other cases regarding CSAM are only exchanged in numbers). LEA may request further feedback. LEA and the hotline are regularly in contact and discuss various topics (legal assessment of specific content, handling of specific report, identification of trends, statistics, technological developments) by phone and email, while operational meetings either at the hotline or at the LEA headquarters take place at least once per year. Reports are forwarded to LEA via email. If content is still online after four weeks, it will be forwarded to the BPjM by our LEA for the purpose of indexing it.

### **Relationship with hosting providers:**

Usually, it is not hotline policy to send NTD requests to German HPs. However, if content is still online five days after contacting LEA (or in some special cases, if requested by the LEA earlier, sometimes even 6 hours after contacting them) jugendschutz.net will also send NTD requests to the HPs. Some HPs send feedback, others do not.

### **Other content dealt with:**

Relevant Laws: German Criminal Code (StGB) and Interstate Treaty for the Protection of Minors on the Internet (JMStV) - The List is not exhaustive:

- Anything that affects or endangers the development of children and adolescents (Article 5 (1) JMStV;
- CSAM/CSEM, Article 184b, 184d StGB;
- Child grooming activities, Article 176 (4) StGB;
- Violent content (Article 131 StGB; Article 4 (1) Nr.5 JMStV);
- Pornographic content (Art 184, 183 d StGB, Art. 4 (2) Nr. 1 JMStV);
- Content inciting to terrorism (Article 4 (2) Nr. 3 JMStV);
- Content seriously violating human dignity (Article 4 (1) Nr. 8 JMStV);
- Content inciting minors to play games putting them in physical danger;
- Incitement to suicide (Article 4 (2) Nr. 3 JMStV);
- Hate speech, (Article 130 StGB, Article 4 (1) Nr. 3 JMStV);
- Terrorist propaganda (Article 86 StGB, Article 4 (1) Nr. 1 JMStV);
- Praise of war, Article 4 (1) Nr. 7 JMStV

**What age constitutes a child:**

Child/minor is any person below the age of 18 years, Article 176 (1) StGB (Child = under 14y) Article 182 (1) StGB (adolescent = under 18y)

Content Type	Legal Status	Actions Taken	Comments/Explanations
Drawings/manga/artistic interpretations of CSAM	Illegal	Notice to LEA. NTD to HPs.	
Digitally generated CSAM/realistic images representing a minor engaged in sexually explicit conduct	Illegal	Notice to LEA. NTD to HPs.	
A minor appearing to be an adult engaged in sexually explicit conduct	Illegal	Notice to LEA. NTD to HPs.	
An adult person appearing to be a minor engaged in sexually explicit conduct	Illegal	Notice to LEA. NTD to HPs.	
Child grooming	Illegal	Notice to LEA. NTD to HPs.	
Sexual extortion of children or soliciting children for sexual purposes	Illegal	Notice to LEA. NTD to HPs.	
Apparent self-generated sexual material	Illegal (dependent on context)	Notice to LEA. NTD to HP.	If distributed to others or possessed by adults, this content is illegal.
Sexualised modelling or posing	Illegal	Notice to LEA. NTD to HPs.	
Sexualised images of children	Illegal	Notice to LEA. NTD to HPs.	
Text depictions of CSAM	Illegal	Notice to LEA. NTD to HPs.	
Fictional text depictions of CSAM	Illegal	Notice to LEA. NTD to HPs.	
Praise of paedophilia or CSA	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	This could be illegal if the written text drifts into text depiction of CSAM.
Manual on CSA	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	This could be illegal if the written text drifts into text depiction of CSAM.
Declaration of committing CSA	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	This is considered illegal if the context is obviously serious.

Context	Legal Status	Actions Taken	Comments/explanation
Images in a medical context	Not illegal and not treated as CSAM.	None	
Non-explicit images in a series of images that contain CSAM	Not illegal	Notice to LEA. NTD to HPs.	The hotline reports these images to HPs and LEA, whilst providing the information that the depiction is part of an image series containing CSAM.
Non-explicit images that have comments or captions of a sexual nature attached to them	Treated as CSAM.	Notice to LEA.	If the written text drifts into text depiction of CSAM (very explicitly) it is considered illegal. However, the hotline usually provides the information to LEA because it is considered as suspected even if the text appears not to be entirely illegal.

Content Location	Accessibility by Law	Actions Taken	Comments/explanation
Private site types (Password protected)	Allowed to access.	Notice to LEA. NTD to HPs.	
Peer to peer (torrent, emule, Kat)	Not allowed to access		
Dropbox/cloud/similar file hosting services	Allowed to access.	Notice to LEA. NTD to HPs.	
Tor/Onion	Allowed to access.	Notice to LEA. NTD to HPs.	The hotline is allowed to access Tor and if reported content is illegal, it is forwarded to LEA. Often a URL accessible only on Tor (.onion) contains CSAM accessible on the clear web. In this case, CSAM is traced and is forwarded to LEA/HPs/ICCAM.
Livestreamed CSE/CSA	Allowed to access.	Notice to LEA. NTD to HPs.	
File Transfer protocol (Ftp://)	Allowed to access.	Notice to LEA. NTD to HPs.	
Social media accounts	Allowed to access.	Notice to LEA. NTD to HPs.	Public social media accounts publishing CSAM/CSEM are reported to the LEA and the social media platform for removal. Public or private social media accounts that are reported to the hotline as publishing CSAM/CSEM or exchanging CSAM/CSEM in private or committing child grooming or sextortion are also reported to the LEA and the social media



			platform for investigation and possible removal/blocking depending on the circumstances.
<b>Email</b>	Not allowed to access or send NTDs.		
<b>Usenet</b>	Allowed to access.	Notice to LEA. NTD to HPs.	Notice to LEA and HPs.
<b>Messengers (Telegram, WhatsApp)</b>	Allowed to access.	Notice to LEA. NTD to HPs.	The hotline is not allowed access to private messaging. However, if Telegram/WhatsApp/Snapchat have been reported as exchanging CSAM/CSEM in private or committing child grooming or sextortion, they are reported to the LEA and the platform for investigation and possible removal/blocking depending on the circumstances.

## *Greece - Safeline*

### **Legal basis for operation:**

The national law does not clearly establish the role, function, or competence of the hotline regarding the handling of CSAM. SafeLine's operations are theoretically covered by Articles 10 and 12 of the Constitution. According to the provisions, anyone may send a written report to the authorities, regarding the protection of personal and social human rights. SafeLine acts as an intermediary between citizens and the Greek Police Authorities, receiving reports from citizens or groups and forwarding them to the police. The hotline can only view and determine the content as illegal or not in a preliminary level in order to forward it to competent authorities.

### **Relationship with Law enforcement:**

The hotline cooperates with the Greek Police Cyber Crime Unit under the basis of letters of support that the Hotline obtains from the LEA on a regular basis (about twice a year); there is no MoU in place regulating this cooperation. There is an 'informal agreement' between SafeLine and the Greek LEA that allows hotline analysts to be able to process and assess URLs containing potential CSAM. Consequently, the hotline staff can process potential CSAM and classify it, in order that the LEA are not overloaded with reports that do not actually constate CSAM. Often, the LEA contacts SafeLine asking for further information on a report that has been forwarded to the Cyber Crime Unit.

### **Relationship with hosting providers:**

SafeLine does not have a MoU with the HPs. While SafeLine can inform the Greek HPs of CSAM on their servers, the HPs are not obliged to remove the material upon the hotline's request. SafeLine can notify the HPs, leaving the choice of whether to remove the content to the discretion of the HPs.

### **Other content dealt with:**

CSAM/CSEM, child grooming activities, solicitation of children for sexual purposes (sexual extortion of children) and sexual harassment, violent content, content inciting to terrorism, hate speech, terrorist propaganda, incitement to suicide.

**What age constitutes a child:**

Child/minor is any person below the age of 18 years. There is a distinction regarding Child Sexual Abuse to a minor under 15 and a minor over 15 in terms of imprisonment.

Content Type	Legal Status	Actions Taken	Comments/Explanations
Drawings/manga/artistic interpretations of CSAM	Illegal	Notice to LEA. NTD to HPs.	Art.348A §3 PC
Digitally generated CSAM/realistic images representing a minor engaged in sexually explicit conduct	Illegal	Notice to LEA. NTD to HPs.	
A minor appearing to be an adult engaged in sexually explicit conduct	Illegal	Notice to LEA. NTD to HPs.	
An adult person appearing to be a minor engaged in sexually explicit conduct	Not illegal	None	
Child grooming	Illegal	Notice to LEA. NTD to HPs.	
Sexual extortion of children or soliciting children for sexual purposes	Illegal	Notice to LEA. NTD to HPs.	
Apparent self-generated sexual material	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	
Sexualised modelling or posing	Illegal	Notice to LEA. NTD to HPs.	Pornographic material consists of any representation or an actual or virtual depiction, in electronic or any other form of material, of the sexual organs or in general the body of a child aimed at causing sexual stimulation, as well as a recording or depiction of an actual or virtual carnal act that arises sexual stimulation by or with a minor.
Sexualised images of children	Illegal	Notice to LEA. NTD to HPs.	
Text depictions of CSAM	Not illegal	Notice to LEA.	
Fictional text depictions of CSAM	Not illegal	Notice to LEA.	
Praise of paedophilia or CSA	Not illegal	Notice to LEA.	
Manual on CSA	Not illegal	Notice to LEA.	
Declaration of committing CSA	Not illegal	Notice to LEA	

Context	Legal Status	Actions Taken	Comments/explanation
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Images in a medical context	Not treated as CSAM.	None	As such, these images are not illegal. Legality depends on the context. If a picture is appeared in another non-medical context, sexualising the child, it is illegal. If it remains in the medical context, it is not sexual, and thus not illegal.
Non-explicit images in a series of images that contain CSAM	Not treated as CSAM.	None	
Non-explicit images that have comments or captions of a sexual nature attached to them	Not treated as CSAM.	None	Comments/titles on a forum/page referring to and sexualising a picture/video but not attached to it are not a priori illegal.

Content Location	Accessibility by Law	Actions Taken	Comments/explanation
Private site types (Password protected)	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	SafeLine is allowed to access all type of location mentioned if the content is not CSAM.
Peer to peer (torrent, emule, Kat)	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	Article 5 (3) of the Directive 2011/93/EU states that "Knowingly obtaining access, by means of information and communication technology, to child pornography shall be punishable by a maximum term of imprisonment of at least 1 year".
Dropbox/cloud/similar file hosting services	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	However, there is a relevant exception for the operation of hotlines in 17 recital of the Directive that states "It also allows activities carried out under domestic legal powers, such as the legitimate possession of child pornography by the authorities in order to conduct criminal proceedings or to prevent, detect or investigate crime. Furthermore, it does not exclude legal defences or similar relevant principles that relieve a person of responsibility under specific circumstances, for example where telephone or Internet hotlines carry out activities to report those cases."
Tor/Onion	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	
Livestreamed CSE/CSA	Allowed to access. Allowed to send NTDs..	Notice to LEA. NTD to HPs.	
File Transfer protocol (Ftp://)	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	
Social media accounts	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	Despite the fact that European legislation acknowledges the operation of hotlines and protects the hotline analysts, when the EU Directive was transferred in the Greek legislation, it was not transferred completely. As a result, there is no such provision of exempting hotlines.
Email	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	
Usenet	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	This is likewise a problem hotline analysts face. There is only an agreement with the Cyber Crime Unit of the Greek Police, in the form of a support letter to SafeLine that is renewed regularly (twice a year) which allows the hotline analysts to process reports.
Messengers (Telegram, WhatsApp)	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	

## Hotline Mandate

## *Hungary - Internet Hotline*

### **Legal basis for operation:**

(1.) Act C of 2003 on electronic communications 149/B-D. § modified by law of Act LXXXV of 2020. and (2) MoU with LEA

### **Relationship with Law enforcement:**

Internet Hotline is in daily contact with LEA (National Bureau of Investigation), and in-person meetings are held several times a year. MoU was signed in 2012. Hotline reports are forwarded to LEA if (1) criminal offence is suspected and (2) the proceeding does not require private prosecution. The following reporting categories are prioritised: CSAM, content promoting drug use, content inciting act of terrorism.

### **Relationship with hosting providers:**

There is no cooperation agreement with hosting providers. Based on Article 4/A., 7 and 10 of Act CVIII of 2001 on certain issues of electronic commerce activities and information society services, Internet Hotline sends requests to content and hosting providers in order to make the illegal content in question inaccessible, or to place appropriate warning signs of age limit onto a website. Based on experience of Internet Hotline, Hungarian service providers mostly cooperate and respond to the requests.

### **Other content dealt with:**

The hotline operates a web-based reporting site where illegal online content can be reported in nine reporting categories: (1) Child Sexual Abuse Material - CSAM, (2) data phishing, (3) cyberbullying, (4) content made accessible without permission, (5) content promoting drug use, (6) terrorism, (7) content involving racism, (8) violence, or (9) other content harmful to minors.

### **What age constitutes a child:**

18 years; CSAM refers to a real person under the age of 18 years.

Content Type	Legal Status	Actions Taken	Comments/Explanations
Drawings/manga/artistic interpretations of CSAM	Not illegal	None	
Digitally generated CSAM/realistic images representing a minor engaged in sexually explicit conduct	Not illegal	None	
A minor appearing to be an adult engaged in sexually explicit conduct	Illegal	Notice to LEA. NTD to HP.	
An adult person appearing to be a minor engaged in sexually explicit conduct	Not illegal	None	
Child grooming	Not illegal (dependent on context)	Notice to LEA. NTD to HP.	The act of grooming is not included in the Hungarian Criminal Code. Anyone requesting self-made sexually explicit images from minors, might commit the crime of (online) harassment or CSAM.
Sexual extortion of children or soliciting children for sexual purposes	Illegal	Notice to LEA. NTD to HP.	
Apparent self-generated sexual material	Illegal (dependent on context)	Notice to LEA. NTD to HP.	If a minor takes a photo of himself/herself and keeps it for themselves, it is not illegal. However, if the photo is sent to another person, who saves and distributes it, that might be considered to be CSAM.
Sexualised modelling or posing	Not illegal	None	It is not regulated by the law.
Sexualised images of children	Not illegal	None	It is not regulated by the law.
Text depictions of CSAM	Not illegal	None	It is not regulated by the law.
Fictional text depictions of CSAM	Not illegal	None	It is not regulated by the law.
Praise of paedophilia or CSA	Illegal (dependent on context)	Notice to LEA.	
Manual on CSA	Illegal (dependent on context)	Notice to LEA.	
Declaration of committing CSA	Illegal (dependent on context)	Notice to LEA.	

Context	Legal Status	Actions Taken	Comments/explanation
Images in a medical context	Not illegal	None	
Non-explicit images in a series of images that contain CSAM	Treated as CSAM.	Notice to LEA. NTD to HP.	If the hotline has access to the series or is informed that the image is part of a series, the image is assessed as illegal. "Series" means that the illegal activity is depicted in several pictures and some of them, if assessed separately could not justify illegality, become illegal because of information available on other illegal pictures of the same series.
Non-explicit images that have comments or captions of a sexual nature attached to them	Not illegal	Notice to LEA.	Depending on context, such reports might be forwarded to LEA.

Content Location	Accessibility by Law	Actions Taken	Comments/explanation
Private site types (Password protected)	Not allowed to access or send NTDs.		Such reports are forwarded to LEA.
Peer to peer (torrent, emule, Kat)	Not allowed to access or send NTDs.		Such reports are forwarded to LEA.
Dropbox/cloud/similar file hosting services	Not allowed to access or send NTDs.		Such reports are forwarded to LEA.
Tor/Onion	Not allowed to access or send NTDs.		Such reports are forwarded to LEA.
Livestreamed CSE/CSA	Allowed to access.		Hotline analysts are not entitled to keep a record of such livestreamed content.
File Transfer protocol (Ftp://)	N/A		Should an incoming hotline report refer to content available on FTP, analysts are not entitled to download the content.
Social media accounts	Allowed to access.		Hotline analysts are not entitled to access password protected content. In cases where such an account is public (i.e., can be viewed without password), it may be assessed.
Email	Not allowed to access or send NTDs.		Hotline analysts are not entitled to access password protected content. In case the reporter provides the hotline with an email account, the analysts may read it, but they are not entitled to enter email accounts, even if username + password are provided by the reporter.
Usenet	N/A		
Messengers (Telegram, WhatsApp)	Not allowed to access or send NTDs.		Hotline analysts are not entitled to access password protected content. In cases where a reporter provides the hotline with a message sent via Messenger/WhatsApp, analysts may read it, but they are not entitled to enter any accounts, even if username + password are provided by the reporter.

Hotline Mandate

Iceland - Barnaheill - Save the Children Iceland

Legal basis for operation:

MoU with the State police of Iceland and a contract with three ministries.

Relationship with Law enforcement:

Barnaheill works in a very close relationship with LEA sends all reports to the national LEA directly who handle assessment of content. Viewing of content is illegal and Barnaheill have not had an exception from that rule. The relationship is based on a MoU/contract.

Relationship with hosting providers:

The national LEA handles Notice and Takedown on behalf of the hotline and communication with hosting providers.

Other content dealt with:

Barnaheill deals with threats, grooming, offering of narcotics to children, offering of alcohol to children, trafficking, prostitution, hate-speech, other punishable acts that concern/involve children and bullying. The applicable laws are the Criminal Code, Child protection law, law about alcohol and tobacco.

What age constitutes a child:

A child is an individual below 18 years of age. The age is the same when it comes to child sexual abuse.

Content Type	Legal Status	Actions Taken	Comments/Explanations
Drawings/manga/artistic interpretations of CSAM	Illegal	Notice to LEA. LEA sends NTD to HP.	
Digitally generated CSAM/realistic images representing a minor engaged in sexually explicit conduct	Illegal	Notice to LEA. LEA sends NTD to HP.	



A minor appearing to be an adult engaged in sexually explicit conduct	Illegal	Notice to LEA. LEA sends NTD to HP.	
An adult person appearing to be a minor engaged in sexually explicit conduct	Illegal	Notice to LEA. LEA sends NTD to HP.	
Child grooming	Illegal	Notice to LEA. LEA sends NTD to HP.	
Sexual extortion of children or soliciting children for sexual purposes	Illegal	Notice to LEA. LEA sends NTD to HP.	
Apparent self-generated sexual material	Illegal	Notice to LEA. LEA sends NTD to HP.	
Sexualised modelling or posing	Illegal	Notice to LEA. LEA sends NTD to HP.	The Icelandic law is based on the ratification of the Lanzarote convention and builds upon the definition used by the convention.
Sexualised images of children	Illegal	Notice to LEA. LEA sends NTD to HP.	
Text depictions of CSAM	Illegal	Notice to LEA. LEA sends NTD to HP.	The likelihood of this being illegal is high, but it would depend on the context.
Fictional text depictions of CSAM	Illegal	Notice to LEA. LEA sends NTD to HP.	The likelihood of this being illegal is high, but it would depend on the context.
Praise of paedophilia or CSA	Illegal	Notice to LEA. LEA sends NTD to HP.	The likelihood of this being illegal is high, but it would depend on the context.
Manual on CSA	Illegal	Notice to LEA. LEA sends NTD to HP.	
Declaration of committing CSA	Illegal	Notice to LEA. LEA sends NTD to HP.	

Context	Legal Status	Actions Taken
Images in a medical context	Not illegal	None
Non-explicit images in a series of images that contain CSAM	Treated as CSAM.	Notice to LEA. LEA sends NTD to HP.
Non-explicit images that have comments or captions of a sexual nature attached to them	Illegal	Notice to LEA. LEA sends NTD to HP.

Content Location	Accessibility by law	Actions Taken
Private site types (Password protected)	N/A	Notice to LEA. LEA sends NTD to HP.
Peer to peer (torrent, emule, Kat)	N/A	Notice to LEA. LEA sends NTD to HP.
Dropbox/cloud/similar file hosting services	N/A	Notice to LEA. LEA sends NTD to HP.
Tor/Onion	N/A	Notice to LEA. LEA sends NTD to HP.
Livestreamed CSE/CSA	N/A	Notice to LEA. LEA sends NTD to HP.
File Transfer protocol (Ftp://)	N/A	Notice to LEA. LEA sends NTD to HP.
Social media accounts	N/A	Notice to LEA. LEA sends NTD to HP.
Email	N/A	Notice to LEA. LEA sends NTD to HP.
Usenet	N/A	Notice to LEA. LEA sends NTD to HP.
Messengers (Telegram, WhatsApp)	N/A	Notice to LEA. LEA sends NTD to HP.

## *Ireland - Hotline.ie operated by Internet Service Providers Association of Ireland (ISPAI)*

### **Legal basis for operation:**

The backbone of the national operational framework is the Government's Working Group on the Illegal and Harmful Use of the Internet Report (1998) (<http://www.justice.ie/en/JELR/IllegalUseofInternet.pdf/Files/IllegalUseofInternet.pdf>), provisioning for, inter alia, (a) the establishment of an Internet Hotline Service where the public may anonymously report suspected illegal content online, particularly "child pornography" or activities relating to the sexual exploitation of children; (b) the development of an Industry Code of Practice and Ethics setting out the duties and responsibilities of online providers operating in/from Ireland and, common acceptable use policies. Furthermore, Hotline.ie has also been recognised and acknowledged under the first Government of Ireland National Action Plan for Online Safety ([https://assets.gov.ie/162/120718132737-7082532-ONLINE SAFETY ACTION PLAN 2018-2019.pdf](https://assets.gov.ie/162/120718132737-7082532-ONLINE%20SAFETY%20ACTION%20PLAN%202018-2019.pdf)) launched by the Taoiseach in July 2018. Hotline.ie also sits on the National Advisory Council for Online Safety (<https://www.gov.ie/en/publication/ebe58-national-advisory-council-for-online-safety-nacos/>)

For over 20 years (ISPAI) Hotline.ie has been managing and enforcing the Code of Practice (<https://www.hotline.ie/library/hotlineie-code-of-practice-2020.pdf>) and providing the Hotline.ie Service (<http://www.hotline.ie/>).

Hotline.ie procedures and operations are agreed and overseen by the Department of Justice and A Garda Síochána (Ireland's National Police Service). These are also documented in detail in the Hotline.ie Operational Procedural Manual.

Article 25 of Directive 2011/93/EU on combating the sexual abuse and sexual exploitation of children and child pornography deals with 'Measures against websites containing or disseminating child pornography'. The activities of Hotline.ie together with An Garda Síochána CSAM blocking initiative fulfil Article 25 in Ireland. The Department of Justice (<http://www.justice.ie/en/JELR/Pages/Cybercrime>), the Cybercrime – Crime and Security Directorate oversees these activities. The remainder of the Directive has been transposed into Irish law."

### **Relationship with Law enforcement:**

As described above, Hotline.ie operations and procedures are agreed and overseen by An Garda Síochána. Hotline.ie notifies all content assessed by Content Analysts as "child pornography" under the Child Trafficking and Pornography Act, 1998 as amended by the Criminal Law (Sexual Offences) Act 2017, predicated on a traffic light system i.e., CSAM hosted in Ireland, CSAM hosted in an INHOPE member country, CSAM hosted in a country without hotline presence. Hotline.ie also notifies confirmed Racism & Xenophobia and financial scams which purport to be Irish financial services or have Irish contact details or appear to have originated from Ireland.

### **Relationship with hosting providers:**

The relationship between online service providers operating in/from Ireland and Hotline.ie is defined through members and non-members. Members of Hotline.ie abide by the Notice and Takedown procedure laid out in the Hotline.ie Code of Practice (<https://www.hotline.ie/library/hotlineie-code-of-practice-2020.pdf>). For further details please see the Hotline.ie Code of Practice which outlines the framework for collaboration between Hotline.ie, online service providers (our members) and national law enforcement, for the purpose of countering the spread of illegal content online, especially CSAM. The Code sets out minimum requirements for participating companies and details the notice and takedown procedure, roles and responsibilities. It also includes general good practice and information regarding Hotline.ie's expertise and support services. There is a certain level of flexibility in the principles set out in the Code to address stakeholders' divergent practices, functions, layering of services, products, variety of business models and stages of maturity.

In respect of online service providers who are not members of Hotline.ie, in these cases Hotline.ie liaises with the nominated An Garda Síochána unit/contact to identify the appropriate course of action on a case-by-case basis.

### **Other content dealt with:**

Activities relating to the sexual exploitation of children, i.e., child grooming - Child Trafficking and Pornography Act, 1998 & Criminal Law (Sexual Offences) Act 2017

Racism & Xenophobia - Prohibition of Incitement to Hatred Act 1989

Financial Scams which purport to be Irish financial services or have Irish contact details or appear to have originated from Ireland.

### **What age constitutes a child:**

A child is any person under the age of 18. The Criminal Law (Sexual Offences) Act 2017 amended the Child Trafficking and Pornography Act to change the defined age of what constitutes a child from 17 to 18. However, offences relating to sexual exploitation i.e., grooming laid out in the Criminal Law (Sexual Offences) Act 2017 vary in the ages they apply to.

Content Type	Legal Status	Actions Taken	Comments/Explanations
Drawings/manga/artistic interpretations of CSAM	Illegal	Notice to LEA. NTD to HPs.	Under Irish law, any video or audio representation that documents a child, or a depiction of a child is covered by the Child Trafficking and Pornography Act, (1998).
Digitally generated CSAM/realistic images representing a minor engaged in sexually explicit conduct	Illegal	Notice to LEA. NTD to HPs.	Under Irish law, any video or audio representation that documents a child, or a depiction of a child is covered by the Child Trafficking and Pornography Act, (1998).
A minor appearing to be an adult engaged in sexually explicit conduct	Illegal	Notice to LEA. NTD to HPs.	The Child Trafficking and Pornography Act (1998) as amended by the Criminal Law (Sexual Offences) Act 2017 makes no reference to appearance of age, only whether the person is under the age of 18.
An adult person appearing to be a minor engaged in sexually explicit conduct	Not illegal	Notice to LEA. NTD to HPs.	The Child Trafficking and Pornography Act (1998) as amended by the Criminal Law (Sexual Offences) Act 2017 makes no reference to appearance of age, only whether the person is under the age of 18.
Child grooming	Illegal	Notice to LEA. NTD to HPs.	
Sexual extortion of children or soliciting children for sexual purposes	Illegal	Notice to LEA. NTD to HPs.	Under Irish law, any video or audio representation of a child, or depicting a child, being sexually abused is illegal.
Apparent self-generated sexual material	Illegal	Notice to LEA. NTD to HPs.	Once material displays a child or a depiction of a child under the age of 18 years old the material is illegal regardless of how it was generated.
Sexualised modelling or posing	Not illegal (dependent on context)	Notice to LEA. NTD to HPs.	If the genitalia or anal areas are displayed with a sexual focus, then these images would fall under the Child Trafficking and Pornography Act 1998 as amended by the Criminal Law (Sexual Offences) Act of 2017 and be deemed to be illegal. "Sexual" or "Sexualised" are not defined under the act.
Sexualised images of children	Not illegal (dependent on context)	Notice to LEA. NTD to HPs.	If the genitalia or anal areas are displayed with a sexual focus, then these images would fall under the Child Trafficking and Pornography Act 1998 as amended by the Criminal Law (Sexual Offences) Act of 2017 and be deemed to be illegal. "Sexual" or "Sexualised" are not defined under the act.
Text depictions of CSAM	Illegal	Notice to LEA. NTD to HPs.	
Fictional text depictions of CSAM	Illegal	Notice to LEA. NTD to HPs.	
Praise of paedophilia or CSA	Not illegal	None	
Manual on CSA	Not illegal (dependent on context)	Notice to LEA. NTD to HPs.	Information manuals alone are not illegal but if it includes text that describes explicit sexual activity involving a child then it would fall under the Child Trafficking and Pornography Act 1998.
Declaration of committing CSA	Not illegal (dependent on context)	Notice to LEA. NTD to HPs.	The declaration alone is not illegal but if it includes text that describes explicit sexual activity involving a child then it would fall under the Child Trafficking and Pornography Act 1998.

Context	Legal Status	Actions Taken	Comments/explanation
Images in a medical context	Not illegal		Exempt by law.
Non-explicit images in a series of images that contain CSAM	Not illegal		As each image is assessed on its own, if the image itself does not meet the criteria established in the Irish law for "child pornography" then the image in itself is not illegal. However, if the images are part of an abuse set which is inclusive of CSAM and hosted in Ireland, then the hotline will seek removal under the Terms of Service / Community Standards.
Non-explicit images that have comments or captions of a sexual nature attached to them	Not illegal		In general, non-explicit images with comments or captions are not illegal in Ireland. However, depending on the nature of the comments or captions and the context of the image it may fall under the offences listed in the Criminal Law (Sexual Offences) Act 2017. For example, if a child under the age of 17 uploaded an image of themselves and received explicitly sexual comments on that image, then it may constitute an offence. In these cases, these are forwarded to LEA and hosting providers.

Content Location	Accessibility by Law	Actions Taken	Comments/explanation
Private site types (Password protected)	Allowed to access. Allowed to send NTDs.		When the content is accessible and classified as illegal under Irish law it would be notified and actioned as per the agreed procedures with the Department of Justice and An Garda Síochána. Under the provision that the hotline is provided with access details by the reporter, otherwise the report would be closed as Insufficient Detail given that the hotline would not be able to access and assess the content.
Peer to peer (torrent, emule, Kat)	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	
Dropbox/cloud/similar file hosting services	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	It depends on the context and how it was reported. If actionable it undergoes the usual NTD Procedure.
Tor/Onion	Allowed to access.	Notice to LEA.	Content captured in ICCAM & Forwarded to LEA.
Livestreamed CSE/CSA	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	The hotline is in the process of reviewing the NTD procedure in cooperation with national LEA.
File Transfer protocol (Ftp://)	N/A		
Social media accounts	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	If the platform is publicly accessible it is actioned through the usual procedures.
Email	N/A		Hotline.ie does not access private email but does receive reports related to email content which it will action through the usual procedures.
Usenet	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	Forwarded to LEA and online service providers.
Messengers (Telegram, WhatsApp)	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	If the platform is publicly accessible it is actioned through the usual procedures.

## Hotline Mandate

*Italy - Save the Children Italy***Legal basis for operation:**

MoU with Law Enforcement to send alleged CSAM reports to LEA. The hotline is not allowed to assess and classify CSAM.

**Relationship with Law enforcement:**

a) The hotline has a MoU with law enforcement

b) The hotline receives reports on alleged child sexual abuse material (CSAM) from the public and it forwards them to the National Centre to fight child pornography online (CNCPO). The Centre is a specialised organ of the Postal and Communications Police, which is part of the National Police under the Ministry of Interior. It is the competent authority tasked with assessing and investigating suspected CSAM as well as initiating procedures aimed at the blocking and removal of confirmed CSAM (including cross-border).

**Relationship with hosting providers:**

No direct contact.

**Other content dealt with:**

None.

**What age constitutes a child:**

A child/minor is any person below the age of 18.

Content Type	Legal Status	Actions Taken	Comments/Explanations
Drawings/manga/artistic interpretations of CSAM	Not illegal (dependent on context)	Notice to LEA. LEA sends NTD to HP.	It depends on the context. As such, these images are not illegal. If "an artistic interpretation," for instance a photo collage, is composed of CSA pictures, is illegal. If in an investigative context, LEA finds out that a drawing is taken from a photo of real child abuse, it is illegal. Artistic reasons or aims cannot be invoked as an excuse.

			CSAM is defined in the Italian Criminal Code as “any representation, by any means, of a child under the age of 18 involved in explicit sexual activities, real or simulated, or any representation of the sexual organs of a minor under 18 years old for sexual purposes.”
<b>Digitally generated CSAM/realistic images representing a minor engaged in sexually explicit conduct</b>	Illegal	Notice to LEA. LEA sends NTD to HP.	
<b>A minor appearing to be an adult engaged in sexually explicit conduct</b>	Illegal	Notice to LEA. LEA sends NTD to HP.	
<b>An adult person appearing to be a minor engaged in sexually explicit conduct</b>	Not illegal (dependent on context)	Notice to LEA.	If the image clearly represents an adult, it is not illegal (for example an adult disguised as a child). If the disguise is explicit, it is not illegal. If the image uses young adults to imply that it is a child, it is illegal.
<b>Child grooming</b>	Illegal	Notice to LEA.	
<b>Sexual extortion of children or soliciting children for sexual purposes</b>	Illegal	Notice to LEA.	
<b>Apparent self-generated sexual material</b>	Not illegal (dependent on context)	Notice to LEA. LEA sends NTD to HP.	Self-generated sexting is not CSAM, but sexting represents a grey area of the law. However, for content to be CSAM, it is required that the image or video be taken by another party than the victim.
<b>Sexualised modelling or posing</b>	Not illegal (dependent on context)	Notice to LEA.	It is a grey area. The dividing line as to what does not constitute CSAM and to what does constitute CSAM – provided that even partial nudity can be CSAM – is the aptitude of such material to entail a sexual impulse, so that nudity for advertising or journalistic purposes is not CSAM (Italian Supreme Court, 2004). But it depends on the context. When the image is a way to attract attention and “advertise” other CSAM images/context, it is illegal. If in an investigative context, the LEA finds out that a minor was obliged to pose or exploited, it is illegal. If the image is a part of a CSAM series, it is illegal.
<b>Sexualised images of children</b>	Illegal	Notice to LEA. LEA sends NTD to HP.	
<b>Text depictions of CSAM</b>	Illegal	Notice to LEA.	
<b>Fictional text depictions of CSAM</b>	Illegal	Notice to LEA.	It is illegal to commit, by any means and with any form of expression, sexual abuse or exploitation against children. No reasons or purposes of an artistic, literary, historical or traditional nature can be invoked at one's own excuse. (e.g., Italian Law 172/2012; art. 414 bis Italian Criminal Code).
<b>Praise of paedophilia or CSA</b>	Illegal	Notice to LEA.	
<b>Manual on CSA</b>	Illegal	Notice to LEA.	
<b>Declaration of committing CSA</b>	Illegal (dependent on context)	Notice to LEA.	Declaring yourself a paedophile is not a crime; the apologia of paedophilia is a crime.



Context	Legal Status	Actions Taken	Comments/explanation
Images in a medical context	Not illegal	Notice to LEA.	The legality depends on the context. As such, these images are not illegal. If a picture is appeared in another non-medical context, sexualising the child, it is illegal.
Non-explicit images in a series of images that contain CSAM	Illegal	Notice to LEA.	If LEA (CNCPO) has access to the series or is informed that the image is part of a series, the image is assessed as illegal.
Non-explicit images that have comments or captions of a sexual nature attached to them	Illegal	Notice to LEA.	Judicial processing of reports by LEA.

Content Location	Accessibility by Law	Actions Taken
Private site types (Password protected)	N/A	Notice to LEA.
Peer to peer (torrent, emule, Kat)	N/A	Notice to LEA.
Dropbox/cloud/similar file hosting services	N/A	Notice to LEA.
Tor/Onion	N/A	Notice to LEA.
Livestreamed CSE/CSA	N/A	Notice to LEA.
File Transfer protocol (Ftp://)	N/A	Notice to LEA.
Social media accounts	N/A	Notice to LEA.
Email	N/A	Notice to LEA.
Usenet	N/A	Notice to LEA.
Messengers (Telegram, WhatsApp)	N/A	Notice to LEA.



Hotline Mandate

## *Italy - Clicca e segnala operated by Telefono Azzurro*

### **Legal basis for operation:**

MoU signed with LEA belonging to the Department of Public Security of the Ministry of Interior to send alleged CSAM reports to LEA. The hotline is not allowed to assess and classify CSAM.

### **Relationship with Law enforcement:**

MoU signed with LEA belonging to the Department of Public Security of the Ministry of Interior.

### **Relationship with hosting providers:**

The hotline does not have direct contact with hosting providers, considering that Notice and Takedown requests are sent to C.N.C.P.O. (Italian National Centre for the fight against sexual exploitation of children online. C.N.C.P.O. is part of Law Enforcement Agencies). The latter maintains contact with the hosting providers and the hotline is usually not further informed about the report's unfolding.

### **Other content dealt with:**

- Images of naked children, non-erotic (These images are not to be considered a felony per se, but they are subject to evaluation in order to understand whether to include them into CSAM categories or not: Articles 600-ter, 600-quater Penal Code)
- Pornographic content on sites for minors (The content is not to be considered a felony per se, but it is subject to evaluation by authorities)
- Solicitation of adult on minor (Article 609-undecies Penal Code)
- Cyberbullying (Articles 595, 612, 612-bis Penal Code; Article 167 Data Protection Code; Law 71/2017);
- Trafficking in minors (Article 601 Penal Code)
- Sex tourism, juvenile (Article 600-quinquies Penal Code)
- Discrimination, racism, homophobia, etc. (Law 95/2003)
- Incitement to paedophilia (Article 414-bis Penal Code)
- Incitement to self-injurious act/suicide (Article 580 Penal Code)
- Incitement to violence against people/animals or things (Article 414 Penal Code)
- Incitement to anorexia/bulimia (Articles 580, 582, 583 Penal Code)
- Incitement to drug use (Article 414 Penal Code; Decree 309/1990)
- Online gambling sites accessible to minors
- Online crimes, identity theft, data theft, etc. (Articles 494, 640-ter, Penal Code)

**What age constitutes a child:**

Italian national legislation considers a child a person under the age of 18. In terms of Child Sexual Abuse laws, the legal age of consent is 14. In accordance with Article 609-quarter, Penal Code the age of consent is set at 16 when the offender is an ancestor or a parent (even if adoptive). The latter refers to cohabitee, the legal guardian and any other person the minor is entrusted to for reasons of care, nurture, education, supervision or custody, or who lives together with the child. Furthermore, the aforementioned categories are punishable by law even if the minor is over 16 and under 18, in case the sexual acts are committed with abuse of the authority directly connected to the adult's covered role in the child's life.

Content Type	Legal Status	Actions Taken	Comments/Explanations
<b>Drawings/manga/artistic interpretations of CSAM</b>	Not illegal (dependent on context)	Notice to LEA. LEA sends NTD to HP.	This type is yet to be defined by the Law. In 2017, the Italian Supreme Court ruled on the possibility for comics (therefore unrelated to actual sexual activities involving minors) to be considered as CSAM, in the event that the drawings are obtained with high quality digital technologies in order to make them appear as real. As the criminal offence is not directed towards an existing minor, the aim of the decision is to punish behaviours that encourage or seduce children into participating in such acts, and hence form part of a subculture favouring child abuse. (Cass. pen., sez. III, 13/01/2017, n. 22265).  Direct report to C.N.C.P.O. (Italian National Centre for the fight against sexual exploitation of children online. C.N.C.P.O., part of the Law Enforcement Agency).
<b>Digitally generated CSAM/realistic images representing a minor engaged in sexually explicit conduct</b>	Illegal	Notice to LEA. LEA sends NTD to HP.	This type is specifically defined by the Law: article 604-quater 1, Penal Code.
<b>A minor appearing to be an adult engaged in sexually explicit conduct</b>	Illegal	Notice to LEA. LEA sends NTD to HP.	This type could fall under article 600-quater1, Penal Code, as the Italian Supreme Court indicated as felony photoshopping the faces of existing minors over adult bodies involved in sexual activities. (Cass. pen., sez. III, 24/11/2017, n. 15757).
<b>An adult person appearing to be a minor engaged in sexually explicit conduct</b>	Not illegal	Notice to LEA. LEA sends NTD to HP.	This type is not illegal per se considering that the depicted person is an adult (but may, at least, constitute different kinds of felonies unrelated to the sexual abuse or exploitation of children). However, the hotline does not assess nor investigate the real nature of the reported contents and submits them to C.N.C.P.O. and Judicial Authorities as it is their duty to establish whether the person involved is a minor or not.
<b>Child grooming</b>	Illegal	Notice to LEA. LEA sends NTD to HP.	This type is specifically defined by the Law: article 609-undecies, Penal Code.
<b>Sexual extortion of children or soliciting</b>	Illegal	Notice to LEA. LEA sends NTD to HP.	This type is defined by the Law, taking into consideration multiple articles of the Penal Code: 629 for what concerns the extortive conduct,

children for sexual purposes			600-ter and 600-quater as regards the possession and distribution of CSAM, 609-quinquies and the aforementioned 609-undecies for what concerns the solicitation of minors for sexual purposes.
Apparent self-generated sexual material	Illegal	Notice to LEA. LEA sends NTD to HP.	This type is currently discussed by the jurisprudence. The controversy is based on the actual danger of exploitation of the child in a wide network of internet users who produce and/or exchange CSAM. In 2016, the Italian Supreme Court declared that the possession of self-generated material does not constitute a felony if the minor willingly sends the material by themselves to a specific user, as the aim of the legislation is to suppress the paedophile market: the risk of exploitation occurs when the material is produced by parties other than the minor. In 2019, the Italian Supreme Court, in accordance with supra-national laws, conversely determined that the possession of self-generated material represents a felony, regardless of the existence of an actual danger of distribution into the network. In fact, the main objects of the protection under criminal law should be the child's image, dignity and sexuality. Therefore, in this case the material's production methods are not taken into consideration and self-generated material may well constitute an element of the offence. (Cass. pen. Sez. III, 18/02/2016, n. 11675; Cass. pen. Sez. III, 21/11/2019, n. 5522)
Sexualised modelling or posing	Not illegal (dependent on context)	Notice to LEA. LEA sends NTD to HP.	Sexualised content, as analysed by the jurisprudence, is any kind of depiction of minors aimed at stimulating other people's concupiscence or sexual arousal (Cass. pen., sez. V, 08/06/2018, n. 33862; Cass. pen., sez. III, 22/04/2004, n. 25464). This type does not constitute a felony, as long as the posing or modelling images are produced and used for commercial and/or promotional purposes. However, if the material appears sexually evocative or inappropriate, reports can be submitted to administrative National Authorities responsible for the control of media. For what concerns posing for artistic purposes, in 2019 the Italian Supreme Court declared that taking professional pictures of a minor, including depicting genitalia, does not constitute a felony as long as the images are produced in order to create a genuinely artistic content, in no way connected to sexual purposes. (Cass. pen., sez. III, 02/04/2019, n. 41590)
Sexualised images of children	Illegal (dependent on context)	Notice to LEA. LEA sends NTD to HP.	As above, sexualised images of children that are clearly produced and/or distributed for sexual purposes are elements of a felony.
Text depictions of CSAM	Not illegal (dependent on context)	Notice to LEA. LEA sends NTD to HP.	This type is defined by the Law at the article 414-bis, Penal Code. The rule punishes incitement to commit any kind of felony related to the sexual abuse or exploitation of children and any form of apology, approval, glorification, or exaltation of such criminal misconducts. Literary, artistic,

			historical, customary purposes cannot be invoked as self-defence.
<b>Fictional text depictions of CSAM</b>	Not illegal (dependent on context)	Notice to LEA. LEA sends NTD to HP.	This type is defined by the Law at the article 414-bis, Penal Code. The rule punishes incitement to commit any kind of felony related to the sexual abuse or exploitation of children and any form of apology, approval, glorification, or exaltation of such criminal misconducts. Literary, artistic, historical, customary purposes cannot be invoked as self-defence.
<b>Praise of paedophilia or CSA</b>	Illegal	Notice to LEA. LEA sends NTD to HP.	This type is defined by the Law at the article 414-bis, Penal Code. The rule punishes incitement to commit any kind of felony related to the sexual abuse or exploitation of children and any form of apology, approval, glorification, or exaltation of such criminal misconducts. Literary, artistic, historical, customary purposes cannot be invoked as self-defence.
<b>Manual on CSA</b>	Illegal (dependent on context)	Notice to LEA. LEA sends NTD to HP.	This type is defined by the Law at the article 414-bis, Penal Code. The rule punishes incitement to commit any kind of felony related to the sexual abuse or exploitation of children and any form of apology, approval, glorification, or exaltation of such criminal misconducts. Literary, artistic, historical, customary purposes cannot be invoked as self-defence.
<b>Declaration of committing CSA</b>	Illegal	Notice to LEA.	

Context	Legal Status	Actions Taken	Comments/explanation
<b>Images in a medical context</b>	Not illegal but treated as CSAM.	Notice to LEA.	The hotline does not assess nor investigate the real nature of the reported contents and submits them to C.N.C.P.O. and Judicial Authorities as it is their duty to establish whether the content is to be considered illegal or not.
<b>Non-explicit images in a series of images that contain CSAM</b>	Treated as CSAM.	Notice to LEA.	The hotline does not assess nor investigate the real nature of the reported contents and submits them to C.N.C.P.O. and Judicial Authorities as it is their duty to establish whether the content is to be considered illegal or not.
<b>Non-explicit images that have comments or captions of a sexual nature attached to them</b>	Treated as CSAM.	Notice to LEA.	The hotline does not assess nor investigate the real nature of the reported contents and submits them to C.N.C.P.O. and Judicial Authorities as it is their duty to establish whether the content is to be considered illegal or not.

Content Location	Accessibility by Law	Actions Taken
Private site types (Password protected)	N/A	Notice to LEA.
Peer to peer (torrent, emule, Kat)	N/A	Notice to LEA.
Dropbox/cloud/similar file hosting services	N/A	Notice to LEA.
Tor/Onion	N/A	Notice to LEA.
Livestreamed CSE/CSA	N/A	Notice to LEA.
File Transfer protocol (Ftp://)	N/A	Notice to LEA.
Social media accounts	N/A	Notice to LEA.
Email	N/A	Notice to LEA.
Usenet	N/A	Notice to LEA.
Messengers (Telegram, WhatsApp)	N/A	Notice to LEA.

## *Japan - Internet Hotline Center (Safer Internet Association)*

### **Legal basis for operation:**

MoU with National Police Agency (NPA). The hotline operation is contracted and funded by NPA.

### **Relationship with Law enforcement:**

MoU with National Police Agency (NPA). The hotline shares reports which it assesses as illegal in accordance with its operational guideline.

### **Relationship with hosting providers:**

Direct contact with hosting providers and hotline sends "Transmission Prevention Measure Request" (aka Notice and Takedown). The service providers do not provide feedback.

### **Other content dealt with:**

- Display of Obscene Electromagnetic Record Media (Item 1, Article 175 of Criminal Law)
- Solicitation/Induction with the Purpose of Prostitution (Number 3, Article 5 and Number 3, Item 2, Article 6 of Anti-Prostitution Act)
- Prohibited Induction Acts violating Act on Regulation on Soliciting Children by Using Opposite Sex Introducing Service on Internet (Article 6 of the said Act)
- Acts of Committing Drug Crimes or Acts to Openly Induce the Abuse of Restricted Drugs\* (Article 9 of New Anti-Drug Act)
- Advertisement of Restricted Drugs (Item 2, Article 20 of Stimulant Drugs Control Act, Item 2, Article 29 and Item 18, Article 50 of Narcotics and Psychotropics Control Act, Number 4, Item 1, Article 4 of Opium Control Act)
- Advertisement of Specified Drugs (Item 5, Article 76 of Pharmaceutical Affairs Act)
- Advertisement of Objects Suspected as Specified Drugs (Number 2, Item 6, Article 76 of Restriction on Inspections and Manufacturing of Goods Suspected as Designated Substances)
- Advertisement of Unapproved Drugs Relevant to Dangerous Drugs (Article 68 of Pharmaceutical Affairs Act)
- Solicitation/Induction to Transfer, Sell, Buy such things as a bank account, an ATM card, and/or a bank book (Item 4, Article 28 of Act on Prevention of transfer of Criminal Proceeds)
- Solicitation/Induction to Transfer, Sell, Buy Unauthorized Mobile Phone Devices, etc. (Article 23 of Mobile Phone Device Improper Use Prevention Act)
- Acts of Illegally Requesting the entry of ID and/or Passcode (Phishing) (Number 1, Article 7 of Unauthorized Computer Access Law)
- Acts of Facilitating Unauthorized Computer Access (Article 5 of Unauthorized Computer Access Law)

**What age constitutes a child:**

Under the age of 18.

Content Type	Legal Status	Actions Taken	Comments/Explanations
Drawings/manga/artistic interpretations of CSAM	Not illegal	None	In January 2020, the Supreme Court of Japan ruled that computer graphics depicting real-life naked children constitute child pornography, upholding a court ruling against a graphic designer who sold such images online. (making it the first judgement of its kind by the top court).
Digitally generated CSAM/realistic images representing a minor engaged in sexually explicit conduct	Not illegal (dependent on context)	Notice to LEA. NTD to HPs.	
A minor appearing to be an adult engaged in sexually explicit conduct	Illegal	Notice to LEA. NTD to HPs.	
An adult person appearing to be a minor engaged in sexually explicit conduct	Not illegal	None	The act itself is not punishable by law, but the act of asking for CSAM then receiving it would be illegal as it falls under the Possession and Provision of Child Pornography and Other Related Acts.
Child grooming	Not illegal (dependent on context)	Notice to LEA.	Child Prostitution, Intermediation in Child Prostitution, as well as Solicitation of Child Prostitution are all illegal under Japanese law. There is no law specifically for sexual extortion of children, but such act can be punished under Intimidation and/or Compulsion.
Sexual extortion of children or soliciting children for sexual purposes	Illegal (dependent on context)	Notice to LEA.	Generating of child pornography is illegal in Japan but if it is self-generated by the minor him/herself, they generally get warnings by the law enforcement or the court, and not punished by law.
Apparent self-generated sexual material	Illegal	Notice to LEA.	To be illegal, it must fulfil the following statement "...the sexual body parts of the child (genital organs, the parts around them, buttocks or breasts) are exhibited or emphasized, which arouses or stimulates the viewer's sexual desire." (Act on Regulation and Punishment of Acts Relating to Child Prostitution and Child Pornography, and the Protection of Children).
Sexualised modelling or posing	Not illegal (dependent on context)	Notice to LEA	To be illegal, it must fulfil the following statement "...the sexual body parts of the child (genital organs, the parts around them, buttocks or breasts) are exhibited or emphasized, which arouses or stimulates the viewer's sexual desire." (Act on Regulation and Punishment of Acts Relating to Child Prostitution and Child Pornography, and the Protection of Children).
Sexualised images of children	Not illegal (dependent on context)	Notice to LEA.	
Text depictions of CSAM	Not illegal	None	
Fictional text depictions of CSAM	Not illegal	None	
Praise of paedophilia or CSA	Not illegal	None	
Manual on CSA	Not illegal	None	
Declaration of committing CSA	Not illegal	None	

Context	Legal Status	Actions Taken
Images in a medical context	Not treated as CSAM	None
Non-explicit images in a series of images that contain CSAM	Not treated as CSAM	None
Non-explicit images that have comments or captions of a sexual nature attached to them	Not treated as CSAM	None

Content Location	Accessibility by Law	Actions Taken	Comments/explanation
Private site types (Password protected)	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	The hotline forwards the report to LEA if assessed as illegal based on its operational guideline.
Peer to peer (torrent, emule, Kat)	N/A		
Dropbox/cloud/similar file hosting services	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	The hotline forwards the report to LEA if assessed as illegal based on its operational guideline.
Tor/Onion	N/A		
Livestreamed CSE/CSA	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	The hotline forwards the report to LAE if assessed as illegal based on its operational guideline.
File Transfer protocol (Ftp://)	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	The hotline forwards the report to LEA if assessed as illegal based on its operational guideline.
Social media accounts	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	The hotline forwards the report to LEA if assessed as illegal based on its operational guideline.
Email	N/A		
Usenet	N/A		
Messengers (Telegram, WhatsApp)	N/A		



## *Latvia - Latvian Safer Internet Center Hotline (LSIC)*

### **Legal basis for operation:**

The hotline is operated by the Latvian Safer Internet Center (LSIC) on the basis of a cooperation contract with State LEA and a Memorandum of Understanding (MoU) with major Hosting Providers. It does not have the authority to request the removal and blocking of access to any CSAM. The LSIC's authority is limited to coordination between competent entities.

### **Relationship with Law enforcement:**

The hotline has cooperation contract with State LEA which determines hotline actions concerning CSAM. The hotline forwards all received CSAM reports to LEA.

### **Relationship with hosting providers:**

Under the Law on the Protection of Children Rights, hosting providers are obliged to remove or block the CSAM stored on their servers.

The Law on Information Society Services regulates the duties of service providers operating in Latvia, including the obligation for providers to comply with the requests of competent state authorities. Moreover, Section 10 of this law provides the liability for service providers in case illegal content is hosted knowingly. Therefore, in order to evade criminal/administrative liability, the service providers must block access or remove all content that is known to be illegal.

The LSIC Hotline has no legal authority to request anything from service providers because it is not an official authority. The Memorandum of Understanding is signed between LSIC and major service providers. The MoU provides possibility for LSIC to pass information to the service providers if approval of LEA is obtained.

In accordance with the MoU, after receiving prior approval from LEA, the LSIC is entitled to send a notification about illegal or harmful content to the service providers but this notification is not legally binding as such. Nevertheless, service providers generally react to such notifications as the liability of the providers for the illegal content hosted is triggered in situations when providers knew about illegal content but did not remove it.

**Other content dealt with:**

- CSAM - Law on Pornography Restrictions (<http://likumi.lv/ta/en/en/id/157638-law-on-pornography-restrictions>) Law on the Protection of the Children's Rights, Section 50 (<http://likumi.lv/ta/en/en/id/49096-law-on-the-protection-of-the-childrens-rights>) Criminal Law Sections 166; 172 (<http://likumi.lv/ta/en/en/id/88966-the-criminal-law>)
- Pornography accessible to children - Law on the Protection of the Children's Rights, Section 50 (<http://likumi.lv/ta/en/en/id/49096-law-on-the-protection-of-the-childrens-rights>) Criminal Law Sections (<http://likumi.lv/ta/en/en/id/88966-the-criminal-law>)
- Cyberbullying – Law on the Protection of the Children's Rights, Sections 19; 50 (<http://likumi.lv/ta/en/en/id/49096-law-on-the-protection-of-the-childrens-rights>) Criminal Law Sections 132; 132.1; 124; 157;174 (<http://likumi.lv/ta/en/en/id/88966-the-criminal-law>)
- Violent content – Law on the Protection of the Children's Rights, Section 50 (<http://likumi.lv/ta/en/en/id/49096-law-on-the-protection-of-the-childrens-rights>) The Administrative Punishment Law regarding Violations in the Scope of Administration, Public Order and the Use of the State Language, Section 11 (<https://likumi.lv/ta/id/314808-administrativo-sodu-likums-par-parkapumiem-parvaldes-sabiedriskas-kartibas-un-valsts-valodas-lietosanas-joma>).
- Hate speech, racism - Criminal Law Sections 71; 74; 77; 78; 149.1; 150(<http://likumi.lv/ta/en/en/id/88966-the-criminal-law>)
- Financial fraud - Criminal Law Sections 177; 177.1; 193.1 (<http://likumi.lv/ta/en/en/id/88966-the-criminal-law>)

**What age constitutes a child:**

A person below 18 is considered a minor. The age is not different for applicable child sexual abuse laws.

Content Type	Legal Status	Actions Taken	Comments/Explanations
Drawings/manga/artistic interpretations of CSAM	Illegal	Notice to LEA. NTD to HPs.	
Digitally generated CSAM/realistic images representing a minor engaged in sexually explicit conduct	Illegal	Notice to LEA. NTD to HPs.	
A minor appearing to be an adult engaged in sexually explicit conduct	Illegal	Notice to LEA. NTD to HPs.	
An adult person appearing to be a minor engaged in sexually explicit conduct	Not illegal (dependent on context)	None	If the person is known to be 18 years or older, it is not considered CSAM. If the involved person looks like a child, it might be considered CSAM.
Child grooming	Illegal	Notice to LEA.	
Sexual extortion of children or soliciting children for sexual purposes	Illegal	Notice to LEA. NTD to HPs.	
Apparent self-generated sexual material	Illegal	Notice to LEA. NTD to HPs.	
Sexualised modelling or posing	Illegal	Notice to LEA. NTD to HPs.	From Pornography Restriction Law - child pornography - material of a pornographic nature, in which a child is depicted or described, or any other material in which:  a) a child who is involved in sexual activities, a child completely or partially without clothing in a

			<p>sexual pose or in clothing of an obscene nature is depicted or described, children's genitals or pubic region are depicted in a stimulating way.</p> <p>b) a person having the appearance of a child who is involved in the activities specified in Sub-clause "a" of this Clause is depicted or described or presented in a manner specified in Sub-clause "a";</p> <p>c) there are realistic images with a non-existent child who is involved in the activities specified in Sub-clause "a" of this Clause or presented in a manner specified in Sub-clause "a".</p>
<b>Sexualised images of children</b>	Illegal	Notice to LEA. NTD to HPs.	
<b>Text depictions of CSAM</b>	Illegal	Notice to LEA. NTD to HPs.	
<b>Fictional text depictions of CSAM</b>	Illegal	Notice to LEA. NTD to HPs.	
<b>Praise of paedophilia or CSA</b>	Illegal	Notice to LEA. NTD to HPs.	
<b>Manual on CSA</b>	Illegal	Notice to LEA. NTD to HPs.	
<b>Declaration of committing CSA</b>	Illegal	Notice to LEA. NTD to HPs.	

Context	Legal Status	Actions Taken	Comments/explanation
<b>Images in a medical context</b>	Not illegal		<p>There is exception in Law on Pornography Restrictions Section 9 Special Application</p> <p>(1) The prohibitions or restrictions specified in regulatory enactments shall not apply to the circulation of material of a pornographic nature, if they are utilised for the following purposes:</p> <p>i) the process of education, for scientific, research or medical purposes.</p> <p>ii) in specialised sectors of literature, as well as in libraries of the relevant sector (in specialised libraries).</p> <p>iii) law enforcement institutions and courts - for the performance of duties thereof, prescribed by regulatory enactments.</p> <p>iv) in so far as is necessary for a State or local government institution - for the performance of duties prescribed by regulatory enactments.</p> <p>(2) The prohibitions or restrictions prescribed by regulatory enactments for the circulation of child pornography shall not apply only in the cases specified in Paragraph one, Clauses 1, 3 and 4 of this Section.</p>

<b>Non-explicit images in a series of images that contain CSAM</b>	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	If the content sexualizes a child, it is illegal. If one picture of a series is a child that cannot be considered any way in a sexual context, then that picture might not be illegal, but the hotline reports it to LEA anyway.
<b>Non-explicit images that have comments or captions of a sexual nature attached to them</b>	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	If comments sexualize a child, that content is illegal.

<b>Content Location</b>	<b>Accessibility by Law</b>	<b>Actions Taken</b>	<b>Comments/explanation</b>
<b>Private site types (Password protected)</b>	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	Hotline evaluates content and if it is illegal forward it to LEA and later to HP or ICCAM.
<b>Peer to peer (torrent, emule, Kat)</b>	Not allowed to access or send NTDs.	Notice to LEA. NTD to HPs.	Report is forwarded to LEA without evaluation.
<b>Dropbox/cloud/similar file hosting services</b>	Not allowed to access or send NTDs.		
<b>Tor/Onion</b>	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	The hotline evaluates content and if it is illegal, forwards it to LEA and later to HP and ICCAM if there is link to the clear web.
<b>Livestreamed CSE/CSA</b>	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	The hotline has never received such a report. In the case that the hotline receives such a report, LEA would be informed immediately.
<b>File Transfer protocol (Ftp://)</b>	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	
<b>Social media accounts</b>	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	Public social media accounts publishing CSAM are reported to LEA and the social media platform for removal. Public or private social media accounts that are reported to the hotline as publishing CSAM or exchanging CSAM in private or committing child grooming or sextortion are also reported to the LEA and the social media platform for investigation and possible removal/blocking, depending on the circumstances.
<b>Email</b>	Not allowed to access or send NTDs.		Hotline cannot access e-mail content unless the reporter sends the e-mail content. LEA is notified in case of suspicion of CSAM.
<b>Usenet</b>	N/A		
<b>Messengers (Telegram, WhatsApp)</b>	N/A		

## *Lithuania - Communications Regulatory Authority of the Republic of Lithuania (RRT)*

### **Legal basis for operation:**

1. Written agreement with LEA
2. Law on Education

After 10 years of operation recognition of the hotline came with the new amendment of the Law on Education which entered into force on 1 September 2017.

Article 23(2). Reporting about cyberbullying and other illegal or restricted information. This article contains the following provisions: reporting of illegal content to the hotline of RRT, duty of RRT to investigate reports, cooperation with the LEA and other responsible institutions, right of RRT to give mandatory orders to the hosting service providers of Lithuania to take down illegal content hosted on their servers or to disable access to it, duty of the hosting service providers to take down illegal content or to disable access to it when the order from RRT was received.

### **Relationship with Law enforcement:**

The hotline has written agreements with the LEA since 2007 when the hotline was established. The hotline sends reports to LEA on illegal content hosted in Lithuania, such as CSAM, pornography, content inciting racial or ethnic hatred, cyberbullying, content leading to violence, drugs.

### **Relationship with hosting providers:**

According to the agreement with the LEA, 5 working days after having forwarded a report on CSAM to the LEA, the hotline sends Notice and Take Down (NTD) request to the Lithuanian hosting service provider if that content is still online. In case of other illegal content hosted in Lithuania, the hotline sends NTD request to the hosting service provider few hours after having forwarded a report to the LEA. Some hosting service providers provide feedback about the removal of content, others do not. The hotline periodically checks if content is removed, and if not, the hotline sends NTD request again.

It was an initiative of RRT to elaborate and declare the Memorandum on clean internet environment. The purpose of this Memorandum is to create a cleaner internet environment by joint efforts of hosting service providers operating in Lithuania and RRT. The following commitments of hosting service providers are described in this Memorandum: to react promptly to NTD requests received from RRT, to take down illegal content when noticed on their own platform, inform clients about this Memorandum, encourage clients not to publish illegal content and regularly announce information about actions taken against illegal content.

The Memorandum was announced on Safer Internet Day 2020 (11 February 2020). Currently the 9 biggest hosting service providers in Lithuania have joined the Memorandum.

#### Other content dealt with:

Pornography, content inciting racial or ethnic hatred, cyberbullying, content leading to violence, drugs.

Law on the Protection of Minors against the Detrimental Effect of Public Information.

#### What age constitutes a child:

A child/minor in Lithuania is a person below the age of 18 years. The age of consent to sexual relations is 16.

Content Type	Legal Status	Actions Taken	Comments/Explanations
Drawings/manga/artistic interpretations of CSAM	Illegal	Notice to LEA. NTD to HPs.	<p>This type is not defined by the law but is found in the jurisprudence.</p> <p>According to the agreement with the LEA, 5 working days after having forwarded a report on CSAM to the LEA, the hotline sends Notice and Take Down (NTD) request to the Lithuanian hosting service provider if that content is still online. In case of other illegal content hosted in Lithuania, the hotline sends NTD request to the hosting service provider few hours after having forwarded a report to LEA.</p> <p>A national classification board must confirm illegality of material before notice is sent to LEA or HP.</p>
Digitally generated CSAM/realistic images representing a minor engaged in sexually explicit conduct	Illegal	Notice to LEA. NTD to HPs.	
A minor appearing to be an adult engaged in sexually explicit conduct	Illegal	Notice to LEA. NTD to HPs.	Adult pornography is illegal in Lithuania.
An adult person appearing to be a minor engaged in sexually explicit conduct	Illegal	Notice to LEA. NTD to HPs.	

Child grooming	Illegal	Notice to LEA. NTD to HPs.	
Sexual extortion of children or soliciting children for sexual purposes	Illegal	Notice to LEA. NTD to HPs.	
Apparent self-generated sexual material	Illegal	Notice to LEA. NTD to HPs.	This type is not defined by the law but is found in the jurisprudence.
Sexualised modelling or posing	Illegal	Notice to LEA. NTD to HPs.	This type is not defined by the law but is found in the jurisprudence.
Sexualised images of children	Illegal	Notice to LEA. NTD to HPs.	
Text depictions of CSAM	Illegal	Notice to LEA. NTD to HPs.	
Fictional text depictions of CSAM	Illegal	Notice to LEA. NTD to HPs.	
Praise of paedophilia or CSA	Illegal	Notice to LEA. NTD to HPs.	
Manual on CSA	Illegal	Notice to LEA. NTD to HPs.	
Declaration of committing CSA	Illegal	Notice to LEA. NTD to HPs.	

Context	Legal Status	Actions Taken
Images in a medical context	Not illegal	None
Non-explicit images in a series of images that contain CSAM	Treated as CSAM.	Notice to LEA. NTD to HPs.
Non-explicit images that have comments or captions of a sexual nature attached to them	Treated as CSAM.	Notice to LEA. NTD to HPs.

Content Location	Accessibility by law	Actions taken
Private site types (Password protected)	Allowed to access. Allowed to send NTDs.	Notice to LEA.
Peer to peer (torrent, emule, Kat)	Not allowed to access or send NTDs.	Notice to LEA.
Dropbox/cloud/similar file hosting services	Allowed to access. Allowed to send NTDs.	Notice to LEA.
Tor/Onion	Not allowed to access or send NTDs.	Notice to LEA.
Livestreamed CSE/CSA	Allowed to access. Allowed to send NTDs.	Notice to LEA.
File Transfer protocol (Ftp://)	Allowed to access. Allowed to send NTDs.	Notice to LEA.
Social media accounts	Allowed to access. Allowed to send NTDs.	Notice to LEA.
Email	Not allowed to access or send NTDs.	Notice to LEA.
Usenet	Allowed to access. Allowed to send NTDs.	Notice to LEA.
Messengers (Telegram, WhatsApp)	Not allowed to access or send NTDs.	Notice to LEA.

## Hotline Mandate

## Luxembourg – BEE SECURE Stopleveline

**Legal basis for operation:**

MOU with law enforcement.

**Relationship with Law enforcement:**

The hotline has an MOU with LEA and holds bi-annual meetings. The hotline sends reports to LEA on reports in the context of CSAM; discrimination, racism and revisionism; and terrorism.

**Relationship with hosting providers:**

Only LEA is in direct contact with ISP and follows NTD procedures.

**Other content dealt with:**

Discrimination, racism and revisionism (Code Pénal: Chapitre VI. - Du racisme, du révisionnisme et d'autres discriminations Articles 454 – 457); and terrorism (Code Pénal: Chapitre III-1.- Du terrorisme Article 135, 327-331).

**What age constitutes a child:**

Anyone under the age of 18 years.

Content Type	Legal Status	Actions Taken	Comments/Explanations
Drawings/manga/artistic interpretations of CSAM	Illegal	Notice to LEA. LEA sends NTD to HP.	If hosted nationally, LEA starts NTD procedure (contacting hosting providers)
Digitally generated CSAM/realistic images representing a minor engaged in sexually explicit conduct	Illegal	Notice to LEA. LEA sends NTD to HP.	
A minor appearing to be an adult engaged in sexually explicit conduct	Illegal	Notice to LEA. LEA sends NTD to HP.	
An adult person appearing to be a minor engaged in sexually explicit conduct	Illegal	Notice to LEA. LEA sends NTD to HP.	
Child grooming	Illegal	Notice to LEA.	



		LEA sends NTD to HP.	
Sexual extortion of children or soliciting children for sexual purposes	Illegal	Notice to LEA. LEA sends NTD to HP.	
Apparent self-generated sexual material	Illegal	Notice to LEA. LEA sends NTD to HP.	
Sexualised modelling or posing	Illegal	Notice to LEA. LEA sends NTD to HP.	
Sexualised images of children	Illegal	Notice to LEA. LEA sends NTD to HP.	
Text depictions of CSAM	Illegal	Notice to LEA. LEA sends NTD to HP.	
Fictional text depictions of CSAM	Illegal	Notice to LEA. LEA sends NTD to HP.	
Praise of paedophilia or CSA	Not illegal.		
Manual on CSA	Illegal	Notice to LEA. LEA sends NTD to HP.	
Declaration of committing CSA	Illegal	Notice to LEA. LEA sends NTD to HP.	

Context	Legal Status	Actions Taken	Comments/explanation
Images in a medical context	Treated as CSAM.	Notice to LEA. LEA sends NTD to HP.	In the cases where these images fulfil criteria of posing they are treated as CSAM.
Non-explicit images in a series of images that contain CSAM	Not illegal and not treated as CSAM.		According to Interpol Assessment training, each image should be assessed individually.
Non-explicit images that have comments or captions of a sexual nature attached to them	Illegal and treated as CSAM.	Notice to LEA. LEA sends NTD to HP.	

Content Location	Accessibility by law	Actions taken
Private site types (Password protected)	Not allowed to access or send NTDs.	
Peer to peer (torrent, emule, Kat)	Not allowed to access or send NTDs.	
Dropbox/cloud/similar file hosting services	Allowed to access.	Notice to LEA.
Tor/Onion	Allowed to access	Notice to LEA.
Livestreamed CSE/CSA	Not applicable	
File Transfer protocol (Ftp://)	Not applicable	
Social media accounts	Allowed to access.	Notice to LEA.
Email	Not allowed to access or send NTDs.	
Usenet	Not allowed to access or send NTDs.	
Messengers (Telegram, WhatsApp)	Allowed to access	Notice to LEA.

Hotline Mandate

## *Malta - Childwebalert Hotline*

### **Legal basis for operation:**

The Foundation for Social Welfare Services (FSWS), which runs the Maltese Hotline Childwebalert, has a Memorandum of Understanding with the Malta Police Force allowing hotline analysts to view and analyse content received on the online reporting platform. Adding to this a standard of procedures is signed and reviewed regularly between the hotline and the cybercrime unit within the Malta Police Force.

### **Relationship with Law enforcement:**

The relationship is very good. The Malta Police Force is a key partner of the hotline, which consults them on local cases and sends illegal content received through the online platform.

### **Relationship with hosting providers:**

The hotline does not have a direct relationship with hosting providers. LEA sends notices to national hosting providers.

### **Other content dealt with:**

Grooming and hate speech.

### **What age constitutes a child:**

A child is a minor below the age of 18. The age of sexual consent in Malta is 16 years.

Content Type	Legal Status	Actions Taken	Comments/ Explanations
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Drawings/manga/artistic interpretations of CSAM	Illegal	Notice to LEA. LEA sends NTD to HP.	
Digitally generated CSAM/realistic images representing a minor engaged in sexually explicit conduct	Illegal	Notice to LEA. LEA sends NTD to HP.	
A minor appearing to be an adult engaged in sexually explicit conduct	Illegal	Notice to LEA. LEA sends NTD to HP.	
An adult person appearing to be a minor engaged in sexually explicit conduct	Illegal	Notice to LEA. LEA sends NTD to HP.	
Child grooming	Illegal	Notice to LEA. LEA sends NTD to HP.	
Sexual extortion of children or soliciting children for sexual purposes	Illegal	Notice to LEA. LEA sends NTD to HP.	
Apparent self-generated sexual material	Illegal	Notice to LEA. LEA sends NTD to HP.	
Sexualised modelling or posing	Illegal	Notice to LEA. LEA sends NTD to HP.	
Sexualised images of children	Illegal	Notice to LEA. LEA sends NTD to HP.	
Text depictions of CSAM	Illegal	Notice to LEA. LEA sends NTD to HP.	
Fictional text depictions of CSAM	Illegal	Notice to LEA. LEA sends NTD to HP.	
Praise of paedophilia or CSA	Illegal	Notice to LEA. LEA sends NTD to HP.	
Manual on CSA	Illegal	Notice to LEA. LEA sends NTD to HP.	
Declaration of committing CSA	Illegal	Notice to LEA. LEA sends NTD to HP.	

Context	Legal Status	Actions Taken
Images in a medical context	Not treated as CSAM	None

Non-explicit images in a series of images that contain CSAM	Not illegal	None
Non-explicit images that have comments or captions of a sexual nature attached to them	Illegal	Notice to LEA.

Content Location	Accessibility by Law	Actions Taken	Comments/Explanations
Private site types (Password protected)	Allowed to access.	Notice to LEA.	
Peer to peer (torrent, emule, Kat)	Allowed to access.	Notice to LEA.	
Dropbox/cloud/similar file hosting services	Allowed to access.	Notice to LEA.	
Tor/Onion	Allowed to access.	Notice to LEA.	
Livestreamed CSE/CSA	Allowed to access.	Notice to LEA.	
File Transfer protocol (Ftp://)	Allowed to access.	Notice to LEA.	
Social media accounts	Allowed to access.	Notice to LEA.	
Email	Allowed to access.	Notice to LEA.	
Usenet	Allowed to access.	Notice to LEA.	
Messengers (Telegram, WhatsApp)	Allowed to access.	Notice to LEA.	Only if they are publicly available, e.g. Telegram Groups

## *Netherlands - Meldpunt Kinderporno/EOKM*

### **Legal basis for operation:**

MoU with LEA and the public prosecutor.

### **Relationship with Law enforcement:**

MoU with LEA and the public prosecutor. The hotline and LEA have an agreement with each other on the type of reports each party should receive.

### **Relationship with hosting providers:**

Most of the hosting providers in the Netherlands are very cooperative. One of them is a sponsor of the hotline. The hotline is in direct contact with them and sends them NTDs via the hotline's report management system SCART. Some of them provide feedback, others do not.

The hotline also is in close contact with some of the websites that have a large volume of CSAM and sends them NTDs along with the hosting provider. They usually remove the material within 24 hours, most of them even within 2 hours. Some of these websites provide feedback as well.

### **Other content dealt with:**

Only CSAM and CSEM (which according to Dutch law, is also child pornography) Article 240b.

### **What age constitutes a child:**

Under the age of 18.

Content Type	Legal Status	Actions Taken	Comments/Explanations
Drawings/manga/artistic interpretations of CSAM	Illegal (dependent on context)	NTD to HPs.	According to the law, for this to be illegal, it must be so realistic that you can hardly tell if this is a real person or not.  if illegal: notice is sent to HP. If not illegal: depends on the HP. Some HPs do not want to receive doubtful material.
Digitally generated CSAM/realistic images representing a minor engaged in sexually explicit conduct	Illegal (dependent on context)	NTD to HPs.	According to the law, for this to be illegal, it must be so realistic that you can hardly tell if this is a real person or not.  if illegal: notice is sent to HP. If not illegal: depends on the HP. Some HPs do not want to receive doubtful material.
A minor appearing to be an adult engaged in sexually explicit conduct	Illegal	NTD to HPs.	
An adult person appearing to be a minor engaged in sexually explicit conduct	Illegal (dependent on context)	NTD to HPs.	Officially: when someone appears to be underage, it can be marked as illegal. However, if it can be proven that the person is 18 or older, it is technically not illegal. So, in this case: report it to the HP.
Child grooming	N/A		Hotline only deals with images.
Sexual extortion of children or soliciting children for sexual purposes	N/A		Hotline only deals with images.
Apparent self-generated sexual material	Illegal	NTD to HPs.	
Sexualised modelling or posing	Illegal	NTD to HPs.	
Sexualised images of children	Illegal	NTD to HPs.	
Text depictions of CSAM	N/A		Hotline only deals with images.
Fictional text depictions of CSAM	N/A		Hotline only deals with images.
Praise of paedophilia or CSA	N/A		Hotline only deals with images.
Manual on CSA	N/A		Hotline only deals with images.
Declaration of committing CSA	N/A		Hotline only deals with images.

Context	Legal Status	Actions Taken	Comments/explanation
Images in a medical context	Dependent on content	NTD to HPs.	If the images fit the criteria of CSAM, it is most likely CSAM, regardless of the context.
Non-explicit images in a series of images that contain CSAM	Illegal	NTD to HPs.	
Non-explicit images that have comments or captions of a sexual nature attached to them	Dependent on context	NTD to HPs.	Depends on whether the text is added to the image itself or if they are comments detached from the image itself.

Content Location	Accessibility by Law	Actions Taken	Comments/explanation
Private site types (Password protected)			Depends on the site type.
Peer to peer (torrent, emule, Kat)	Not allowed to access or send NTDs.		
Dropbox/cloud/similar file hosting services	Not allowed to access or send NTDs.		
Tor/Onion	Allowed to send NTDs.	NTD to HPs.	Not able to send NTDs on torrent websites as they are not traceable.
Livestreamed CSE/CSA	Allowed to send NTDs.	NTD to HPs.	
File Transfer protocol (Ftp://)	Not allowed to access or send NTDs.	None	
Social media accounts	Allowed to send NTDs.	NTD to HPs.	
Email	Not allowed to access or send NTDs.	None	
Usenet	Not allowed to access or send NTDs.	None	
Messengers (Telegram, WhatsApp)	Allowed to send NTDs.	NTD to HPs.	

## *Poland - Dyżurnet.pl operated by NASK*

### **Legal basis for operation:**

According to the Act on the National Cyber Security System, NASK-PIB was indicated as one of the Computer Security Incident Response Team (CSIRT). NASK-PIB's tasks include providing a telephone line or website service operating in the field of reporting and analysis of cases of distribution, propaganda or transmission of child pornography via information and communication technologies, referred to Directive 2011/92/EU of the European Parliament and the Council from 13.12.2011 on combating sexual abuse and sexual exploitation of children and child pornography, Replacing Council Framework Decision 2004/68/WSiSW. The task at NASK-PIB is carried out by Dyżurnet.pl.

### **Relationship with Law enforcement:**

NASK and the Polish LEA signed a Cooperation Agreement in 2018 to cooperate in the field of training, sharing tools and technology, but without specifically listing the cooperation on combating CSAM online. Dyżurnet.pl has support letters from LEA, as part of the application process to receive EC funding. These letters state that any report from the hotline will be processed. All illegal content which is hosted in Poland and is within Dyżurnet.pl's scope is reported to LEA.

### **Relationship with hosting providers:**

Dyżurnet.pl acts within the 2002 Act of Providing Services by Electronic Means. It is established that any Polish service provider needs to react to a "reliable" notification of illegal content. The majority of providers remove questioned content but some refuse (especially in non-CSAM cases) and need a court decision.

### **Other content dealt with:**

Child grooming (art. 200a. C.C), public promotion and approving conduct of paedophile nature (art. 200b. C.C), public presentation of pornographic content involving animals or using violence (art. 202 §2. C.C), public promotion of fascist or other totalitarian systems or propagating hate based on country or ethnic origin, race, and religion as well as public content insulting a group of people or individuals based on country or ethnic origin etc. (art. 256 and 257. C.C)



**What age constitutes a child:**

The age of consent is 15 (art. 200. § 1 C.C), but a minor is any person below 18 years of age (art. 202. C.C)

Content Type	Legal Status	Actions Taken	Comments/Explanations
Drawings/manga/artistic interpretations of CSAM	Illegal	Notice to LEA. NTD to HPs.	Minor must participate in a sexual act.
Digitally generated CSAM/realistic images representing a minor engaged in sexually explicit conduct	Illegal	Notice to LEA. NTD to HPs.	Minor must participate in a sexual act.
A minor appearing to be an adult engaged in sexually explicit conduct	Illegal (dependent on context)		Dyżurnet.pl assesses the age on the Tanner Scale basis. If there is no reliable additional information regarding the age of such a person who appears to be an adult, no action is taken.
An adult person appearing to be a minor engaged in sexually explicit conduct	Not illegal	None	
Child grooming	Illegal	Notice to LEA.	Concerns minors under 15 years of age.
Sexual extortion of children or soliciting children for sexual purposes	Illegal	Notice to LEA.	Concerns minors under 15 years of age.
Apparent self-generated sexual material	Illegal	Notice to LEA. NTD to HPs.	Concerns pornographic content.
Sexualised modelling or posing	Not illegal	NTD to HPs.	Modelling/posing classified by Dyżurnet.pl as child sexual exploitation material (CSEM).
Sexualised images of children	Not illegal	NTD to HPs.	Concerns explicit sexual context.
Text depictions of CSAM	Illegal	Notice to LEA. NTD to HPs.	
Fictional text depictions of CSAM	Illegal	Notice to LEA. NTD to HPs.	
Praise of paedophilia or CSA	Illegal	Notice to LEA and HPs.	
Manual on CSA	Illegal	Notice to LEA. NTD to HPs.	
Declaration of committing CSA	Illegal	Notice to LEA.	

Context	Legal Status	Actions Taken	Comments/explanation
Images in a medical context	Not illegal		Medical material cannot be treated as illegal pornography.
Non-explicit images in a series of images that contain CSAM	Not treated as CSAM		Dyżurnet.pl assess every single image.
Non-explicit images that have comments or captions of a sexual nature attached to them	Not treated as CSAM		If a comment praises paedophilia or CSA it is illegal, but it is not treated as CSAM.

Content Location	Accessibility by Law	Actions Taken	Comments/explanation
Private site types (Password protected)	Allowed to access.	Notice to LEA. NTD to HPs.	It can be accessed if the login data is provided.
Peer to peer (torrent, emule, Kat)	N/A		
Dropbox/cloud/similar file hosting services	Allowed to access.	Notice to LEA. NTD to HPs.	
Tor/Onion	Allowed to access.	Notice to LEA. NTD to HPs.	
Livestreamed CSE/CSA	Allowed to access.	Notice to LEA. NTD to HPs.	
File Transfer protocol (Ftp://)	Allowed to access.	Notice to LEA. NTD to HPs.	
Social media accounts	Allowed to access.	Notice to LEA. NTD to HPs.	.
Email	Allowed to access.	Notice to LEA. NTD to HPs.	
Usenet	N/A		
Messengers (Telegram, WhatsApp)	Allowed to access.	Notice to LEA. NTD to HPs.	If the login data is provided, it can be accessed.

Hotline Mandate

## *Portugal - Linha Internet Segura*

### **Legal basis for operation:**

MOU with Law Enforcement (judiciary police)

### **Relationship with Law enforcement:**

MOU – Lihna Internet Segura (LIS) sends LEA reports regarding all types of sexual violence involving minors online - (CSAM, child online grooming, online sexual harassment, non-consensual image sharing, etc). Even if the CSAM is not located in Portugal, LIS informs national LEA of the location of the content and domain name.

### **Relationship with hosting providers:**

LIS only has direct contact with one hosting provider in Portugal. For the others it uses general emails available to report abuse. Usually, LIS does not receive feedback and the way LIS currently works around the current situation is via LEA, who are also notified at the same time as the hosting providers. LEA also notifies the hosting provider for takedown, and LEA provides feedback to the hotline.

### **Other content dealt with:**

Hate speech and incitement to violence - criminalized under article 240.º of the Portuguese Penal Code.

### **What age constitutes a child:**

Child 0 - 14 years old (child sexual abuse laws are applied to minors from 0 to 17, but have different legal frameworks depending on the age gap of the minor. For example, from 0 to 14 any sexual intercourse is considered child sexual abuse, but between 14 to 16 it is only considered abuse if the adult has taken advantage of the inexperience of the minor - if the sexual act is consensual according to article 173.º Portuguese Penal Code).

Content Type	Legal Status	Actions Taken	Comments/Explanations
Drawings/manga/artistic interpretations of CSAM	Illegal	Notice to LEA. NTD to HPs.	
Digitally generated CSAM/realistic images representing a minor engaged in sexually explicit conduct	Illegal	Notice to LEA. NTD to HPs.	
A minor appearing to be an adult engaged in sexually explicit conduct	Illegal	Notice to LEA. NTD to HPs.	
An adult person appearing to be a minor engaged in sexually explicit conduct	Not illegal	N/A	
Child grooming	Illegal	Notice to LEA. NTD to HPs.	If the hotline can reach the victim, he/she is referred to the hotline's victim support services for psychological and legal support.
Sexual extortion of children or soliciting children for sexual purposes	Illegal	Notice to LEA. NTD to HPs.	If the hotline can reach the victim, he/she is referred to the hotline's victim support services for psychological and legal support.
Apparent self-generated sexual material	Not illegal	Notice to LEA. NTD to HPs.	If the minor is older than 14 years of age, it is more difficult to access if they are a minor or not.
Sexualised modelling or posing	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	The Crime of Child Pornography in the Portuguese penal code is redundant regarding the definition of the acts that should be criminalized under this type of crime. Considering illegal content that shows «acts of pornographic nature»- the interpretation of those acts by national jurisprudence, and International Law, considers material of pornographic nature any content that depicts a minor in a sexualized way, or depicts a minor in any sexual act. In those cases, the content can be considered as sexualising the child and the material can be considered illegal.
Sexualised images of children	Illegal	Notice to LEA. NTD to HPs.	
Text depictions of CSAM	Illegal (dependent on context)	Notice to LEA.	It is only considered a crime if the text depictions of CSAM are in the context of a conversation with a minor.
Fictional text depictions of CSAM	Illegal (dependent on context)	Notice to LEA.	It is only considered a crime if the text depictions of CSAM are in the context of a conversation with a minor.
Praise of paedophilia or CSA	Illegal (dependent on context)	Notice to LEA.	It is only considered a crime if the text depictions of CSAM are in the context of a conversation with a minor.
Manual on CSA	Illegal (dependent on context)	Notice to LEA.	It is only considered a crime if the text depictions of CSAM are in the context of a conversation with a minor.
Declaration of committing CSA	Illegal (dependent on context)	Notify LEA.	If it is a confession of a crime, it is treated as that crime - child sexual abuse.

Context	Legal Status	Actions Taken	Comments/explanation
Images in a medical context	Illegal	Notice to LEA. NTD to HPs.	Depends on the context. Was the picture taken consensually or not and for an academic purpose? If not, and under the Baseline category of focusing on a sexual organ of a child, it would be considered illegal.
Non-explicit images in a series of images that contain CSAM	Not illegal but treated as CSAM.	Notice to LEA.	It depends on if the context is known or not. If the material is a sequence of a known set of pictures of abuse, the hotline would refer it to LEA as being part of a known situation of abuse. If the hotline does not know the context and the image is not depicting CSAM, it is not considered illegal in Portugal.
Non-explicit images that have comments or captions of a sexual nature attached to them	Illegal and treated as CSAM.	Notice to LEA.	The hotline would refer the case to LEA and treat the case as CSAM but would not submit it in ICCAM.

## *Romania - Ora de Net*

### **Legal basis for operation:**

MoU with LEA, MoU with the Authority for Child Rights Protection and Adoption.

### **Relationship with Law enforcement:**

The collaboration protocol with the Romanian LEA came into force in 2016 and after this point reports were sent to this authority. Reports refer to CSAM content and child nudity when the camera focuses on intimate areas, grooming and sexual blackmail. The hotline reports are received by DCCO (Directorate for Combating Organized Crime) officers, who constantly request additional details about certain cases when they deem it necessary. The LE officers within this structure constantly participate in the events organized by the hotline and periodically request details about the activity of the hotline and the number of reports transmitted. Also, all actions related to improving the activities of the hotline are discussed in advance with this LEA department, and subsequently formalized through the necessary documents.

### **Relationship with hosting providers:**

According to the collaboration protocols agreed with the national LEA and other authorities, the reports are sent to them, and if the situation requires, the LEA request the service providers to delete the illegal content. However, the hotline is in advanced discussions with the LEA to modify the collaboration protocol so that the hotline has the legal possibility to directly request service providers to remove CSAM content, and inform LEA.

### **Other content dealt with:**

1. Grooming: In Romanian law, grooming is defined as "recruiting minors for sexual purposes" and is incriminated by Article 222 of the Penal Code: ""The act of the adult to propose to a minor who has not reached the age of 13 to meet, in order to commit an act of those provided in art. 220 or art. 221, including when the proposal was made by means of distance transmission, shall be punished by imprisonment from one month to one year or by a fine.
2. Abuse of a minor: legal definition is "ill-treatment of a minor," endangering his physical or mental development is criminalized by Article 197 of the Criminal Code: Abuse of a minor physical, intellectual or moral development of the minor, by the parents or by any person in whose care the minor is in custody, shall be punished by imprisonment from 3 to 7 years and the prohibition of the exercise of certain rights.
3. Adult pornography accessible to minors (if they are on servers in the country): Romanian legislation, by law number 196/2003 on preventing and combating pornography, states in Article 7 that "persons who make pornographic sites are required to password-protect and access will be allowed only after a fee per minute has been paid by the user, established by the site developer and declared to the tax authorities." In Romania, pornographic content accessible to persons under 18 is prohibited.
4. Hate speech is incriminated by Article 369 of the Penal Code, which stipulates that "inciting the public, by any means, to hate or discriminate against a category of persons is punishable by imprisonment from 6 months to 3 years or a fine." The related legislation also provides for a series of sanctions, or fines, for acts that involve

incitement to racial hatred or behaviours that seek to humiliate people and are motivated by the person's religion, gender, ethnicity, or sexual orientation.

### What age constitutes a child:

According to the legislation, a minor is any person under the age of 18.

However, the age of consent is 15.

The Criminal Code distinguishes between acts of "child pornography," "rape" and "sexual intercourse with a minor" - Article 220."

1. Sexual intercourse, oral or anal intercourse, as well as any other acts of penetration vaginal or anal sex committed with a minor between the ages of 13 and 15 is punishable by imprisonment from one to 5 years.
2. The deed provided in par. (1), committed on a minor who has not reached the age of 13, shall be punished by imprisonment from 2 to 7 years and the prohibition of the exercise of certain rights.
3. The deed provided in par. (1), committed by an adult with a minor aged between 13 and 18, when the adult has abused his authority or influence over the victim, is punishable by imprisonment from 2 to 7 years and a ban on exercising certain rights.
4. The deed provided in par. (1) - (3) shall be sanctioned with imprisonment from 3 to 10 years and the prohibition of the exercise of certain rights, when: the minor is a direct relative, brother or sister; the minor is in the care, protection, education, guarding or treatment of the perpetrator; was committed for the purpose of producing pornographic material.
5. The facts provided in par. (1) and para. (2) shall not be sanctioned if the age difference does not exceed 3 years.

Content Type	Legal Status	Actions Taken	Comments/Explanations
Drawings/manga/artistic interpretations of CSAM	Not illegal	None	
Digitally generated CSAM/realistic images representing a minor engaged in sexually explicit conduct	Illegal	Notice to LEA. LEA sends NTD to HPs.	Incriminated by law: Criminal Code, article 374: 4. Child pornography means any material that depicts a minor with explicit sexual behaviour or that, although it does not present a real person, credibly simulates a minor with such behaviour.
A minor appearing to be an adult engaged in sexually explicit conduct	Illegal	Notice to LEA. LEA sends NTD to HPs.	It is handled as CSAM if there are suspicions or evidence that the depicted person is a minor.
An adult person appearing to be a minor engaged in sexually explicit conduct	Illegal	Notice to LEA. LEA sends NTD to HPs.	Incriminated by law: Criminal Code, article 374: 4. Child pornography means any material that depicts a minor with explicit sexual behaviour or that, although it does not present a real person, credibly simulates a minor with such behaviour.
Child grooming	Illegal	Notice to LEA.	Grooming- In Romanian law, grooming is defined as "recruiting minors for sexual purposes" and is incriminated by Article 222 of the Penal Code: "The act of the adult to propose to a minor who has not reached the age of 13 to meet, in order to commit an act of those provided in art. 220 or art. 221, including when the proposal was made by means of distance transmission, shall be punished by imprisonment from one month to one year or by a fine."

Sexual extortion of children or soliciting children for sexual purposes	Illegal	Notice to LEA.	
Apparent self-generated sexual material	Illegal	Notice to LEA. LEA sends NTD to HPs.	
Sexualised modelling or posing	Not illegal	Notice to LEA.	Not illegal if models are non-nude.
Sexualised images of children	Not illegal	Notice to LEA.	Not illegal if models are non-nude.
Text depictions of CSAM	Not illegal	Notice to LEA.	
Fictional text depictions of CSAM	Not illegal	None	
Praise of paedophilia or CSA	Not illegal	None	
Manual on CSA	Not illegal	None	
Declaration of committing CSA	Not illegal	None	

Context	Legal Status	Actions Taken	Comments/explanation
Images in a medical context	Not illegal	None	None
Non-explicit images in a series of images that contain CSAM	Treated as CSAM.	Notice to LEA. LEA sends NTD to HPs.	Notice LEA or partner hotlines.
Non-explicit images that have comments or captions of a sexual nature attached to them	Treated as CSAM.	Notice to LEA. LEA sends NTD to HPs.	Notice LEA or partner hotlines.

Content Location	Accessibility by Law	Actions Taken	Comments/explanation
Private site types (Password protected)	Allowed to access. Allowed to send NTDs.	Notice to LEA. LEA sends NTD to HPs.	Notice LEA or partner hotlines.
Peer to peer (torrent, emule, Kat)	Allowed to access. Allowed to send NTDs.	Notice to LEA. LEA sends NTD to HPs.	Notice LEA or partner hotlines.
Dropbox/cloud/similar file hosting services	Allowed to access. Allowed to send NTDs.	Notice to LEA. LEA sends NTD to HPs.	Notice LEA or partner hotlines.
Tor/Onion	Allowed to access. Allowed to send NTDs.	Notice to LEA. LEA sends NTD to HPs.	Notice LEA or partner hotlines.
Livestreamed CSE/CSA	Allowed to access. Allowed to send NTDs.	Notice to LEA. LEA sends NTD to HPs.	Notice LEA or partner hotlines.
File Transfer protocol (Ftp://)	Allowed to access. Allowed to send NTDs.	Notice to LEA. LEA sends NTD to HPs.	Notice LEA or partner hotlines.
Social media accounts	Allowed to access. Allowed to send NTDs.	Notice to LEA. LEA sends NTD to HPs.	Depending on circumstances, for content found on public accounts, or reported by another user that permitted the hotline to access his account, a notice is sent to LEA.
Email	Not allowed to access or send NTDs.	None	
Usenet	Allowed to access. Allowed to send NTDs.	Notice to LEA. LEA sends NTD to HPs.	Notice LEA or partner hotlines
Messengers (Telegram, WhatsApp)	Allowed to access. Allowed to send NTDs.	Notice to LEA. LEA sends NTD to HPs.	The hotline can access content found on public chat rooms.



Hotline Mandate

## ***Russia - Friendly Runet Foundation***

### **Legal basis for operation:**

MoU with Law Enforcement Agencies.

### **Relationship with Law enforcement:**

MoU with LEA since 2009. The hotline forwards to LEA any type of content within its remit assessed as manifestly illegal, no matter the hosting country. LEA may request further feedback. The MoU stipulates that the hotline shall forward content to the LEA when it is in doubt as per the legality of content. LEA and the hotline are regularly in contact and discuss on various topics by phone and email, even daily, while operational meetings either at the hotline or at the LEA headquarters take place at least once per year. Reports are forwarded to LEA via a dedicated LEA reporting platform.

### **Relationship with hosting providers:**

The hotline does not have direct contact with its country's hosting providers. The hotline sends them Notice and Takedown requests. The hosting providers do not provide feedback after the hotline's requests, but the hotline has an automated system for detecting resource closures and this information is transmitted to ICCAM automatically via the API.

### **Other content dealt with:**

The Friendly Runet Foundation hotline deals only with Child Sexual Abuse Material.

### **What age constitutes a child:**

18 years constitutes a child in Russian Federation. This age does not differ from the age at which child sexual abuse laws apply.

Content Type	Legal Status	Actions Taken	Comments/Explanations
Drawings/manga/artistic interpretations of CSAM	Illegal	Notice to LEA. NTD to HPs.	This type is not defined by the law but is found in the jurisprudence.
Digitally generated CSAM/realistic images representing a minor engaged in sexually explicit conduct	Illegal	Notice to LEA. NTD to HPs.	This type is not defined by the law but is found in the jurisprudence.
A minor appearing to be an adult engaged in sexually explicit conduct	Illegal	Notice to LEA. NTD to HPs.	
An adult person appearing to be a minor engaged in sexually explicit conduct	Illegal	Notice to LEA. NTD to HPs.	
Child grooming	Illegal	Notice to LEA. NTD to HPs.	
Sexual extortion of children or soliciting children for sexual purposes	Illegal	Notice to LEA. NTD to HPs.	
Apparent self-generated sexual material	Illegal	None	
Sexualised modelling or posing	Illegal	None	
Sexualised images of children	Illegal	None	
Text depictions of CSAM	Not illegal		
Fictional text depictions of CSAM	Not illegal		
Praise of paedophilia or CSA	Illegal	Notice to LEA. NTD to HPs.	
Manual on CSA	Illegal	Notice to LEA. NTD to HPs.	
Declaration of committing CSA	Illegal	Notice to LEA. NTD to HPs.	

Context	Legal Status	Actions Taken	Comments/explanation
Images in a medical context	Not illegal and not treated as CSAM.		These images are not illegal. Legality depends on the context. If a picture appears in another non-medical context and it is sexualising the child, it is illegal. If it remains in the medical context and it is not sexual, it is thus not illegal.
Non-explicit images in a series of images that contain CSAM	Not illegal and not treated as CSAM.		
Non-explicit images that have comments or captions of a sexual nature attached to them	Not illegal and not treated as CSAM.		

Content Location	Accessibility by Law	Actions Taken	Comments/explanation
Private site types (Password protected)	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	When CSAM is detected, the hotline notifies LEA and, after their consent, sends NTD to providers.
Peer to peer (torrent, emule, Kat)	N/A	None	
Dropbox/cloud/similar file hosting services	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	When CSAM is detected, the hotline notifies LEA and, after their consent, sends NTD to providers.
Tor/Onion	N/A	None	
Livestreamed CSE/CSA	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	When CSAM is detected, the hotline notifies LEA and, after their consent, sends NTD to providers.
File Transfer protocol (Ftp://)	N/A	None	
Social media accounts	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	When CSAM is detected, the hotline notifies LEA and, after their consent, sends NTD to providers.
Email	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	When CSAM is detected, the hotline notifies LEA and, after their consent, sends NTD to providers.
Usenet	N/A	None	
Messengers (Telegram, WhatsApp)	N/A	None	

## *Slovenia - Spletno oko*

### **Legal basis for operation:**

The process of receiving and examining the reports and their notification to LEA is regulated by the Operational Procedures Manual, which is signed by the hotline and LEA.

### **Relationship with Law enforcement:**

The Operational Procedures Manual is the agreement in place between the hotline and LEA. The hotline forwards reports of CSAM and hate speech to the national LEA, no matter the hosting country. The hotline forwards content to LEA also when in doubt as per the legality of content. LEA and the hotline are regularly in contact and discuss on various topics (legal assessment of specific content, handling of specific report, identification of trends, statistics, technological developments).

### **Relationship with hosting providers:**

When LEA confirm the illegality of the reported content, they inform and give the hotline the permission to notify the relevant service provider about the allegedly illegal content. Subsequently, the hotline notifies the service provider about the illegal CSAM on their server when the material is hosted in Slovenia. The takedown request by the hotline does not have binding power on the service provider. The hosting providers provide feedback. In practice only a very small part of reported material is located on servers under Slovenian jurisdiction.

### **Other content dealt with:**

1. Solicitation of persons under 15 years of age (Article 173a of the Criminal Code)
2. Public Incitement to Hatred, Violence, or Intolerance (Article 297 of the Criminal Code)

### **What age constitutes a child:**

A child is any person below the age of 18 years. Article 173a of the Criminal Code refers to solicitation of persons under 15 years of age.

Content Type	Legal Status	Actions Taken	Comments/Explanations
Drawings/manga/artistic interpretations of CSAM	Illegal	Notice to LEA. NTD to HPs.	The Slovenian Penal Code stipulates whoever acquires, produces, distributes, sells, imports, exports or otherwise offers pornographic or other sexual material involving minors or their realistic images, or who possesses such material, shall be punished. The same applies to gaining access to such material through information or communication technologies or discloses the identity of a minor in such material (Article 176. of Slovenian Penal Code).
Digitally generated CSAM/realistic images representing a minor engaged in sexually explicit conduct	Illegal	Notice to LEA. NTD to HPs.	Realistic images of minors involved in sexual acts are prohibited.
A minor appearing to be an adult engaged in sexually explicit conduct	Illegal (dependent on context)	Notice to LEA. NTD to HPs	It is handled as CSAM if there is evidence that the depicted person is a minor.
An adult person appearing to be a minor engaged in sexually explicit conduct	Illegal (dependent on context)	Notice to LEA. NTD to HPs	If a person looks underage, then the content is prohibited. If the hotline establishes that the adult is older than 18, then it is not prohibited. The legislation does not specifically define this.
Child grooming	Illegal	Notice to LEA. NTD to HPs.	Child grooming is defined by the law as "the act of sexual proposals by an adult to a minor under 18 years" or solicitation to manufacture or manufacture a CSAM with a person under 18 years of age.
Sexual extortion of children or soliciting children for sexual purposes	Illegal	Notice to LEA. NTD to HPs	Sexual extortion of children or soliciting children for sexual purposes are defined in article 173. and 176. of the Slovenian Penal Code.
Apparent self-generated sexual material	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	Producing CSAM is prohibited, but the child who created self-generated sexual material will not be punished, not even if she/he distributed that material.
Sexualised modelling or posing	Illegal	Notice to LEA. NTD to HPs.	Content of sexual nature includes images of children, naked or semi-naked, with focus on genitalia or the nudity or in sexually explicit positions, wearing age-inappropriate clothing or with age-inappropriate objects suggesting a sexually explicit setting. This excludes a priori images of nudism or naturism without a focus on the body of the child, as well as other images of naked and semi-naked children in a non-sexualised context.
Sexualised images of children	Illegal	Notice to LEA. NTD to HPs.	
Text depictions of CSAM	Illegal	Notice to LEA. NTD to HPs	The Slovenian Penal Code stipulates whoever acquires, produces, distributes, sells, imports, exports or otherwise offers pornographic or other sexual material involving minors or their realistic images, or who possesses such material, shall be punished. Text is also considered as material.
Fictional text depictions of CSAM	Illegal	Notice to LEA. NTD to HPs	
Praise of paedophilia or CSA	Not illegal	None	
Manual on CSA	Illegal	Notice to LEA. NTD to HPs.	Sexual material involving minors.
Declaration of committing CSA	Illegal (dependent on context)	Notice to LEA. NTD to HPs	If LEA can prove it.

Context	Legal Status	Actions taken	Comments/explanation
Images in a medical context	Not illegal and not treated as CSAM.		
Non-explicit images in a series of images that contain CSAM	Not illegal and not treated as CSAM.	Notice to LEA.	Such material is not considered illegal per default, but they can be used by LEA to identify victims.
Non-explicit images that have comments or captions of a sexual nature attached to them	Not illegal and not treated as CSAM.		Such images are not illegal, but comments of sexual nature attached to them may be.

Content Location	Accessibility by Law	Actions Taken	Comments/explanation
Private site types (Password protected)	Not allowed to access or send NTDs.	None	
Peer to peer (torrent, emule, Kat)	Not allowed to access or send NTDs.	None	
Dropbox/cloud/similar file hosting services	Not allowed to access or send NTDs.	None	
Tor/Onion	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs	If content is illegal, notice is sent to LEA and HPs.
Livestreamed CSE/CSA	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	If content is illegal, notice is sent to LEA and HPs.
File Transfer protocol (Ftp://)	Not allowed to access or send NTDs.	None	
Social media accounts	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	If content is illegal, notice is sent to LEA and HPs.
Email	Not allowed to access or send NTDs.	None	
Usenet	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	If content is illegal, Notice to LEA and HPs.
Messengers (Telegram, WhatsApp)	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	Access to private messaging is not allowed to the hotline. However, if Telegram/WhatsApp/Snapchat have been reported as exchanging CSAM/CSEM in private or committing child grooming or sextortion, they are reported to the LEA and the platform for investigation and possible removal/blocking depending on the circumstances.

Hotline Mandate

## *South Africa - Film and Publication Board Hotline for Reporting Child Pornography*

### **Legal basis for operation:**

The Film and Publication Board (FPB) is established by legislation in South Africa to regulate the distribution of films, games, and certain publications with the aim of protecting children from exposure to illegal and inappropriate material. The legal basis for operation is founded on the constitutional right to the freedom of expression. The Constitution of the Republic of South Africa, 1996 (Constitution), makes provision for the right to freedom of expression and provides that:

16 (1) Everyone has the right to freedom of expression, which includes —

- (a) freedom of the press and other media
- (b) freedom to receive or impart information or ideas
- (c) freedom of artistic creativity; and
- (d) academic freedom and freedom of scientific research

(2) The right in subsection (1) does not extend to—

- (a) propaganda for war
- (b) incitement of imminent violence; or
- (c) advocacy of hatred that is based on race, ethnicity, gender, or religion, and that constitutes incitement to cause harm.

The Constitution provides further in terms of section 28 (2) that a child's best interests are of paramount importance in every matter concerning the child.

The FPB is established in terms of section 3 of the Films and Publications Act, 65 of 1996. The FPB is a juristic person which performs the functions, exercise the powers, and carries out the duties assigned to it, conferred on it or imposed upon it in terms of the Films and Publications Act or any other law.

### **Relationship with Law enforcement:**

Section 16 (6) of the Films and Publications Act regulates the classification of publications. Section 16 (6) provides that where a publication submitted to the FPB in terms of this subsection contains child pornography, the Chief Executive Officer of the institution shall refer that publication to a police official of the South African Police Service (SAPS) for investigation and prosecution.

### **Relationship with hosting providers:**

Section 27A of the Films and Publications Act makes provision for the registration and other obligations of internet service providers. In terms of section 27A (1) every internet service provider shall register with the FPB in the manner prescribed by regulations made under the Act and take all reasonable steps to prevent the use of their services for hosting or distribution of child pornography.

Section 27A (2) requires the internet service provider, upon acquiring knowledge that its services are being used for the hosting or distribution of child pornography, to take all reasonable steps to prevent access to the child pornography by any person and report the presence thereof, as well as the particulars of the person maintaining, or hosting, or distributing or in any manner contributing to such internet address, to a police official of the SAPS; and take all reasonable steps to preserve such evidence for purposes of investigation and prosecution by the relevant authorities. Nothing prohibits the FPB from issuing a notice to remove from display.

A compliance officer of the FPB may issue a notice of contravention to any person who is found to have been in contravention of a provisions of the Films and Publications Act.

### **Other content dealt with:**

The primary purpose of the internet hotline of the FPB is to prevent distribution of child sexual abuse material) when detected through the internet. The internet hotline is a service that affords the members of the public with an opportunity to report online CSAM discovered on the internet. This may also include child grooming activities hosted in chat rooms.

### **What age constitutes a child:**

A child is considered to be someone below the age of 18 in terms of section 28 of the Constitution. The Criminal Law (Sexual Offences and Related Matters) Amendment Act defines a “child” as a person under the age of 18 years and “children” has a corresponding meaning. This definition does not create a difference to the age in which child sexual abuse laws are applied to. However, the Child Justice Act becomes applicable when dealing with child sexual abuse offenders who are below the age of 18.



Content Type	Legal Status	Actions Taken	Comments/Explanations
Drawings/manga/artistic interpretations of CSAM	Illegal	Notice to LEA.	<p>Section 20 of the Criminal Law criminalises the creation, making or production of any image, publication, depiction, description, or sequence in any manner whatsoever of child sexual abuse, and provides that such person is guilty of the offence of using a child for CSAM.</p> <p>The FPB must report such activities to law enforcement agencies and enforce the provisions of section 27A of the Act regarding the internet service provider and Section 16.</p>
Digitally generated CSAM/realistic images representing a minor engaged in sexually explicit conduct	Illegal	Notice to LEA.	Reports are attended to by the by the Child Protection Unit on behalf of the Board which prepares a report on the findings. Same is then escalated to the relevant law enforcement agency.
A minor appearing to be an adult engaged in sexually explicit conduct	Illegal	Notice to LEA. NTD to HPs.	The definition of "child pornography" includes any image, however created, or any description of a person, real or simulated, who is, or who is depicted, made to appear, look like, represented or described as being under the age of 18 years.
An adult person appearing to be a minor engaged in sexually explicit conduct	Illegal	Notice to LEA. NTD to HPs.	The definition of "child pornography" includes any image, however created, or any description of a person, real or simulated, who is, or who is depicted, made to appear, look like, represented or described as being under the age of 18 years.
Child grooming	Illegal	Notice to LEA. NTD to HPs	<p>Sexual grooming of children</p> <p>18. (1) A person ("A") who—</p> <p>(a) manufactures, produces, possesses, distributes or facilitates the manufacture, production or distribution of an article, which is exclusively intended to facilitate the commission of a sexual act with or by a child ("B")</p> <p>(b) manufactures, produces, possesses, distributes or facilitates the manufacture, production or distribution of a publication or film that promotes or is intended to be used in the commission of a sexual act with or by "B"</p> <p>(c) supplies, exposes, or displays to a third person ("C")—</p> <p>(i) an article which is intended to be used in the performance of a sexual act</p> <p>(ii) child pornography or pornography; or</p> <p>(iii) a publication or film, with the intention to encourage, enable, instruct, or persuade C to perform a sexual act with B; or</p> <p>(d) arranges or facilitates a meeting or communication between C and B by any means from, to or in any part of the world, with the intention that C will perform a sexual act with B, is guilty of the offence of promoting the sexual grooming of a child.</p>

<b>Sexual extortion of children or soliciting children for sexual purposes</b>	Illegal	Notice to LEA. NTD to HPs.	
<b>Apparent self-generated sexual material</b>	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	If a service provider has knowledge that its services are used for the hosting of sexual material, the hosting provider shall be expected to take all reasonable steps to prevent the use of their services for the hosting or distribution of CSAM.
<b>Sexualised modelling or posing</b>	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	Modelling and posing need to comply with the definition of CSAM as contained in the Films and Publications Act and the Criminal Law; Sexual Offences and Related Matters Amendment Act in order to be deemed child pornography.
<b>Sexualised images of children</b>	Illegal (dependent on context)	Notice to LEA.	Reports are referred to the relevant law enforcement agency for further investigations.
<b>Text depictions of CSAM</b>	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	CSAM is defined as any description or presentation of a person, real or simulated, who is, or who is depicted or described or presented as being, under the age of 18 years, of an explicit or sexual nature, whether such image or description or presentation is intended to stimulate erotic or aesthetic feelings or not, including any such image or description of such person.
<b>Fictional text depictions of CSAM</b>	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	Each case is assessed based on its own facts, the Criminal Law (Sexual Offences and Related Matters) Amendment Act does not specifically list this case as an offence.
<b>Praise of paedophilia or CSA</b>	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	
<b>Manual on CSA</b>	Illegal	Notice to LEA.	Reports are referred to the relevant law enforcement agency for further investigations.
<b>Declaration of committing CSA</b>	Illegal	Notice to LEA.	Criminal laws of the country become applicable (The Criminal Procedure Act and The Criminal Law -Sexual Offences and Related Matters Amendment Act.  The FPB must report such activities to LEA and enforce the provisions of section 27A of the Act regarding the service provider and Section 16.

Context	Legal Status	Actions Taken	Comments/explanations
Images in a medical context	Dependent on context.		Content is judged within context and, except with respect to CSAM, may be classified with reference to the classification guidelines of the FPB relating to the protection of children from exposure to disturbing, harmful, or age-inappropriate materials where it constitutes a bona fide documentary, is of scientific, literary, or artistic merit or is a matter of public interest.
Non-explicit images in a series of images that contain CSAM	Dependent on context.		Content is judged within context and, except with respect to child pornography, may be classified with reference to the classification guidelines of the FPB relating to the protection of children from exposure to disturbing, harmful, or age-inappropriate materials where it constitutes a bona fide documentary, is of scientific, literary, or artistic merit or is a matter of public interest.
Non-explicit images that have comments or captions of a sexual nature attached to them	Dependent on context.		Content is judged within context and, except with respect to CSAM, may be classified with reference to the classification guidelines of the FPB relating to the protection of children from exposure to disturbing, harmful, or age-inappropriate materials where it constitutes a bona fide documentary, is of scientific, literary, or artistic merit or is a matter of public interest.

Content Location	Accessibility by Law	Actions Taken	Comments/explanation
Private site types (Password protected)	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	Including online gaming chats.
Peer to peer (torrent, emule, Kat)	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	If the reported content is illegal, notice to LEA and HPs.
Dropbox/cloud/similar file hosting services	Not allowed to access or send NTDs.		
Tor/Onion	Allowed to access.	Notice to LEA.	The hotline is allowed to access Tor, and if reported content is illegal, it is forwarded to LEA. Often a URL accessible only on Tor (.onion) contains CSAM accessible on the open web. In this case, CSAM is traced and is forwarded to LEA/HPs/ICCAM.
Livestreamed CSE/CSA	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	If the reported content is illegal, notice to LEA and HPs.
File Transfer protocol (Ftp://)	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	If reported content is illegal, notice to LEA and HPs.
Social media accounts	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	Public social media accounts publishing CSAM/CSEM are reported to the LEA and the

			social media platform for removal. Public or private social media accounts that are reported to the hotline as publishing CSAM/CSEM or exchanging CSAM/CSEM in private or committing child grooming or sextortion are also reported to LEA and the social media platform for investigation and possible removal/blocking depending on the circumstances (see child grooming and soliciting children for sexual purposes).
<b>Email</b>	Not allowed to access or send NTDs.		
<b>Usenet</b>	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	If the reported content is illegal, notice to LEA and HPs.
<b>Messengers (Telegram, WhatsApp)</b>	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs	Access to private messaging is not allowed to the hotline. However, if Telegram/WhatsApp/Snapchat have been reported as exchanging CSAM/CSEM in private or committing child grooming or sextortion, they are reported to the LEA and the platform for investigation and possible removal/blocking depending on the circumstances (see child grooming and soliciting children for sexual purposes).

## *Sweden - ECPAT Hotline*

### **Legal basis for operation:**

Hotline's operations are allowed by law. ECPAT Sweden is mentioned in the legislative history as an exception to the prohibition in section 16:10a in the penal code which regulates acts of child pornography.

### **Relationship with Law enforcement:**

ECPAT Sweden has a close relationship with LEA as well as an agreement stipulating how reports to them should be handled. Reports to LEA are sent when the report concerns a suspect crime that may have taken place in Sweden, if the suspect crime is committed by a Swedish person, if the victim is Swedish, or if the suspected material is hosted in Sweden.

### **Relationship with hosting providers:**

ECPAT Sweden has a dialogue with the frequently appearing hosting providers and sends them NTDs. Some of them have white-flagged the hotline which has shortened the NTD-procedure. The hotline does get feedback sometimes from some hosting providers.

### **Other content dealt with:**

All crimes related to sexual exploitation of children, i.e.: trafficking in children for sexual purposes, rape of a child, sexual exploitation of a child, sexual assault of a child, sexual intercourse with a descendant, sexual intercourse with a sibling, exploitation of a child for sexual posing, exploitation of a child through the purchase of a sexual act, sexual molestation, contact with a child for sexual purposes, child marriage offence, unlawful breach of privacy.

### **What age constitutes a child:**

0-17 years

Content Type	Legal Status	Actions Taken	Comments/Explanations
Drawings/manga/artistic interpretations of CSAM	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	A drawing is illegal if it is very realistic and, in some way, shown or spread to others. However, it is legal to draw such material if you keep it for yourself.
Digitally generated CSAM/realistic images representing a minor engaged in sexually explicit conduct	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	A drawing is illegal if it is very realistic and, in some way, shown or spread to others. However, it is legal to draw such material if you keep it for yourself.
A minor appearing to be an adult engaged in sexually explicit conduct	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	This depends on which exact crime acts within the child pornography crime field are at stake (producing/depicting, dissemination, selling, possession). For producing child pornography - the sexual maturation rate doesn't matter - if it is a child under 18, the "producer" has committed a crime. However, regarding the other acts, if the child appears to be an adult, responsibility is only assigned if it can be seen from the image and its circumstances that the person depicted is under the age of 18.
An adult person appearing to be a minor engaged in sexually explicit conduct	Not illegal		
Child grooming	Illegal	Notice to LEA.	
Sexual extortion of children or soliciting children for sexual purposes	Illegal	Notice to LEA.	
Apparent self-generated sexual material	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	Needs to be a child to be illegal.
Sexualised modelling or posing	Illegal	Notice to LEA. NTD to HPs.	
Sexualised images of children	Illegal	Notice to LEA. NTD to HPs.	
Text depictions of CSAM	Not illegal	None	
Fictional text depictions of CSAM	Not illegal	None	
Praise of paedophilia or CSA	Not illegal	None	
Manual on CSA	Not illegal	None	
Declaration of committing CSA	Illegal (dependent on context)		There is no general prohibition from talking about committing child sexual abuse. However, a person with the aim of committing a sexual act against a child under 15, proposing or agreeing to a meeting with the child, can be accused of the crime: contact with a child for sexual purposes.

Context	Legal Status	Actions Taken	Comments/explanation
Images in a medical context	Treated as CSAM.	Notice to LEA. NTD to HPs.	Such images published in a sexual context would be a concern for the hotline.
Non-explicit images in a series of images that contain CSAM	Illegal	Notice to LEA.	
Non-explicit images that have comments or captions of a sexual nature attached to them	Not illegal		ECPAT Sweden made a study among police officers and prosecutors regarding this grey area material. It was shown that the view of whether these images were illegal or not was divided.

Content Location	Accessibility by Law	Actions Taken	Comments/explanation
Private site types (Password protected)	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	
Peer to peer (torrent, emule, Kat)	N/A		
Dropbox/cloud/similar file hosting services	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	
Tor/Onion	Allowed to access.	Notice to LEA.	
Livestreamed CSE/CSA	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	
File Transfer protocol (Ftp://)	Allowed to access.	Notice to LEA.	As long as the ftp is open 'for all' and does not demand a log-in.
Social media accounts	Not allowed to access or send NTDs.		It is illegal (breach of data security) to log-in on another person's email or social media account.
Email	Not allowed to access or send NTDs.		It is illegal (breach of data security) to log-in on another person's email or social media account.
Usenet	N/A		
Messengers (Telegram, WhatsApp)	Not allowed to access or send NTDs.		It is illegal (breach of data security) to log-in on another person's email or social media account.

## *Turkey - IhbarWeb- ICTA*

### **Legal basis for operation:**

Allowed by Law no. 5651 "Regulation of Publications on the Internet and Combating Crimes Committed by Means of Such Publications".

### **Relationship with Law enforcement:**

Information and Communication Technologies Authority (ICTA) is a national telecommunication regulatory authority. It has a MoU with the national LEA. The hotline sends content which includes CSAM hosted in Turkey or CSAM concerning Turkish people to LEA.

### **Relationship with hosting providers:**

Hosting providers' liabilities are mentioned in Article 5 in the Law no. 5651. The hotline has direct contact with them and sends them Notice and Takedown requests. HPs provide feedback about the requests.

### **Other content dealt with:**

- Law no. 5651 – Hosting providers' liabilities
- Provocation for committing suicide
- Sexual exploitation of children
- To ease the use of drugs
- Supplying drugs which are dangerous for health
- Obscenity
- Prostitution
- To provide place and opportunity for online gambling
- Crimes mentioned in the Law on Crimes Against Atatürk
- Illegal Betting

### **What age constitutes a child:**

A child means every human being below the age of 18 years.



Content Type	Legal status	Actions Taken	Comments/Explanations
Drawings/manga/artistic interpretations of CSAM	Illegal	NTD to HPs.	This type is not defined by the law but is found in the jurisprudence.
Digitally generated CSAM/realistic images representing a minor engaged in sexually explicit conduct	Illegal	NTD to HPs.	This type is not defined by the law but is found in the jurisprudence.
A minor appearing to be an adult engaged in sexually explicit conduct	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	It is handled as CSAM if there is evidence that the depicted person is a minor (age confirmed by LEA or by a partner hotline or the picture is part of a series where the victim is clearly underage). Such information is included in ICCAM, in the notice to LEA as well as to HP. If there is doubt as per the depicted person's age, the context may guide the assessment.
An adult person appearing to be a minor engaged in sexually explicit conduct	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	It is handled as CSAM if there is no evidence that the person is over 18 years old and if the person can easily be perceived as a minor.
Child grooming	Illegal	Notice to LEA.	
Sexual extortion of children or soliciting children for sexual purposes	Illegal	Notice to LEA. NTD to HPs.	
Apparent self-generated sexual material	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	There is no difference on how the hotline handles apparent self-generated and non-self-generated sexual material.
Sexualised modelling or posing	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	They are met in the jurisprudence and used by the LEA. Content of a sexual nature includes images of children, naked, semi-naked or clothed, with focus on genitalia or the nudity or in sexually explicit positions, wearing age-inappropriate clothing or with age-inappropriate objects suggesting a sexually explicit setting. This excludes a priori images of nudism or naturism without a focus on the body of the child, as well as other images of naked and semi-naked children in a non-sexualised context. "Sexualised child modelling" often refers to images/videos produced in a professional setting (professional studio or professional shooting outdoors with the logo of the agency attached) while "sexualised child posing" is content produced in a non-professional environment.
Sexualised images of children	Illegal	Notice to LEA. NTD to HPs.	As in the case of sexualised modelling or posing, content of this category is of a sexual nature. While they are handled the same way (as CSAM), the difference in practice is that these pictures were initially produced in a non-illegal context (such as pictures of children wearing a bikini, at the beach, in gymnastics, child nudism) but they have been altered/photoshopped (often cropped so that focus is on genitalia/nudity, sexualised text or objects are added) in order to be of a sexual nature.
Text depictions of CSAM	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	

<b>Fictional text depictions of CSAM</b>	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	
<b>Praise of paedophilia or CSA</b>	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	
<b>Manual on CSA</b>	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	
<b>Declaration of committing CSA</b>	Illegal (dependent on context)	Notice to LEA. NTD to HPs.	

<b>Context</b>	<b>Legal Status</b>	<b>Actions Taken</b>	<b>Comments/explanation</b>
<b>Images in a medical context</b>	Not illegal		As such, these images are not illegal. Legality depends on the context. If a picture appears in another non-medical context, sexualising the child, it is illegal. If it remains in the medical context, it is not sexual, and thus not illegal.
<b>Non-explicit images in a series of images that contain CSAM</b>	Treated as CSAM.	Notice to LEA. NTD to HPs.	If the hotline has access to the series or is informed that the image is part of a series, the image is assessed as illegal. "Series" means that the illegal activity is depicted in several pictures and some of them, if assessed separately could not justify illegality, become illegal because of information available on other illegal pictures of the same series.
<b>Non-explicit images that have comments or captions of a sexual nature attached to them</b>	Treated as CSAM.	Notice to LEA. NTD to HPs.	Sexualised comments attached to/added on a picture/video make this content illegal (see sexualised images of children).

Content Location	Accessibility by Law	Actions Taken	Comments/explanation
Private site types (Password protected)	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	Notice to LEA and HPs.
Peer to peer (torrent, emule, Kat)	N/A	Notice to LEA.	LEA acts on it.
Dropbox/cloud/similar file hosting services	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	Notice to LEA and HPs.
Tor/Onion	Allowed to access.	Notice to LEA.	LEA acts on it.
Livestreamed CSE/CSA	Allowed to access.	Notice to LEA.	LEA acts on it.
File Transfer protocol (Ftp://)	Allowed to access.	Notice to LEA.	LEA acts on it.
Social media accounts	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	Public social media accounts publishing CSAM/CSEM are reported to LEA and the social media platform for removal. Public or private social media accounts that are reported to the hotline as publishing CSAM/CSEM, or exchanging CSAM/CSEM in private, or committing child grooming or sextortion are also reported to LEA and the social media platform for investigation and possible removal/blocking depending on the circumstances.
Email	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	LEA acts on it.
Usenet	Unknown	Notice to LEA.	LEA acts on it.
Messengers (Telegram, WhatsApp)	Allowed to access. Allowed to send NTDs.	Notice to LEA.	Access to private messaging is not allowed to the hotline. However, if Telegram/WhatsApp/Snapchat have been reported as exchanging CSAM/CSEM in private or committing child grooming or sextortion, they are reported to the LEA and the platform for investigation and possible removal/blocking depending on the circumstances (see child grooming and soliciting children for sexual purposes)

Hotline Mandate

## *United Kingdom - Internet Watch Foundation (IWF)*

### **Legal basis for operation:**

IWF's status as a relevant authority for reporting, assessing, and removing child sexual abuse material on the internet is recognised in a Memorandum of Understanding between the Crown Prosecution Service (CPS) and the National Police Chief's Council (NPCC) - linked to Section 46 of the Sexual Offences Act 2003.

### **Relationship with Law enforcement:**

As above, the IWF has an MoU in place. Where content is found to be hosted in the UK, the IWF contacts the NCA (National Crime Agency) who check to ensure hotline intervention will not interfere with any current investigations UK LEA may have underway. Once they have authorised the IWF to, it can then issue its Notice and Take Down (NTD) to the UK host.

The IWF also reports to NCA those reports hosted outside the UK that do not operate a hotline, and reports. onion sites to them.

### **Relationship with hosting providers:**

As above, NTDs are issued to any UK company found to be hosting CSAM. Where they are an IWF Member, the hotline ensures it has a designated contact and extremely swift response in those instances should occur. Where content has been found with a non-Member, the IWF will explore all avenues for contact and maintain appropriate records regarding most fruitful options for quick communication. If the IWF Membership team deem them suitable, they will naturally pursue them to try to get them into Membership - particularly if hosting becomes common. All UK hosts are contacted by phone to alert them to the NTD being issued and to advise that swift action is required.

### **Other content dealt with:**

Non-photographic child sexual abuse images (NPI) where they are found to be hosted in the UK only - IWF operates a NPI blocking list which is an optional service available to IWF members. The list contains criminal NPI URLs which are hosted outside of the UK.

### **What age constitutes a child:**

Under 18 years old.

The age of consent in the UK is 16 years old.

Content Type	Legal Status	Actions Taken	Comments/Explanations
<b>Drawings/manga/artistic interpretations of CSAM</b>	Illegal	Notice to LEA. NTD to HPs.	<p>There are now case law examples of individuals being prosecuted for possession of NPI.</p> <p>The IWF will only address reports concerning such images when they are hosted in the UK.</p> <p>On those rare occasions where such images are believed to be criminal and are depicted on a website hosted in the UK, we will work in partnership with the hosting provider and LEA to remove the content and provide information to assist investigations into its distribution.</p> <p>Industry members can refer to the IWF as a point of expertise for advice on whether such images on their networks are potentially criminal and should be considered for investigation by LEA.</p> <p>The IWF has no role in the direct investigation of those involved in the distribution or possession of this content.</p> <p>Where NPI is deemed actionable under UK law, we offer an NPI List service to Members so that they can protect users/customers from inadvertently accessing this material. As per our URL List service, this requires a licence agreement.</p>
<b>Digitally generated CSAM/realistic images representing a minor engaged in sexually explicit conduct</b>	Illegal	Notice to LEA. NTD to HP.	<p>In very rare circumstances a NTD may be withheld until an investigation is complete before a website or content is notified to the host. As a rule, as soon as deconfliction checks have been carried out, permission to issue a NTD is granted. Note: NTD's are issued by the IWF not the LEA.</p> <p>The IWF will only address reports concerning such images regardless of hosting country. Working within INHOPE protocols, the IWF will notify Hotlines and LEA partners in the first instance and will subsequently peruse content removal by the hosting county is not timely.</p>
<b>A minor appearing to be an adult engaged in sexually explicit conduct</b>	Illegal	Notice to LEA. NTD to HPs.	<p>If a child is engaged in any sexual activity, it is illegal under UK law.</p> <p>Where hosted in the UK, the IWF requests authorisation from NCA to issue a NTD, then issues the NTD direct to the host and continues to chase until removed.</p>
<b>An adult person appearing to be a minor engaged in sexually explicit conduct</b>	Not illegal	None	

<b>Child grooming</b>	Illegal	Notice to LEA. NTD to HPs.	<p>The investigation of grooming offences is currently a matter for UK police and is outside of the operational scope and remit of the IWF.</p> <p>Where images or videos of child sexual abuse material are involved, the usual process as per below will take place. If the IWF encounters livestreaming that appears to show a child being groomed at that time with no illegal content, the hotline would report to NCA. The IWF is developing technical solutions to help detect and aid the disruption of grooming.</p>
<b>Sexual extortion of children or soliciting children for sexual purposes</b>	Illegal	Notice to LEA. NTD to HP.	Only where an image or video is involved can the usual processes take place. Unless there's clear intelligence of a crime in action/a child appears at immediate significant harm, would the hotline pass this along to the police. The IWF encourages the public to report directly to the police where other illegal activities are concerned that are not directly within the hotline's remit.
<b>Apparent self-generated sexual material</b>	Illegal	Notice to LEA. NTD to HPs.	Where hosted in the UK, the hotline requests authorisation from NCA to issue a NTD, then issues the NTD direct to the host and continues to chase until removed. If victim identification information/intelligence is available this will be forwarded to CEOP within the NCA for investigation with a view to safeguarding the child.
<b>Sexualised modelling or posing</b>	Illegal	Notice to LEAs. NTD to HPs	<p>Sexualised modelling or posing falls within the UK Sentencing Council's Sexual Offences Definitive Guideline category C - 'Other indecent images not falling within categories A or B'.</p> <p>Where hosted in the UK the hotline requests authorisation from NCA to issue a NTD, then issues the NTD direct to the host and continue to chase until removed. Images classified as CSAM in the UK will be reported to all countries.</p>
<b>Sexualised images of children</b>	Not illegal	None	
<b>Text depictions of CSAM</b>	Not illegal	None	Unless there is clear intelligence/suggestion of immediate risk/harm to a child in which case it would be reported to NCA as intelligence.
<b>Fictional text depictions of CSAM</b>	Not illegal	None	
<b>Praise of paedophilia or CSA</b>	Not illegal	Notice to LEA. NTD to HPs.	If hosted in the UK, the NCA would be advised, and permission sought to issue a NTD.
<b>Manual on CSA</b>	Illegal	Notice to LEA.	Possession is illegal. The IWF therefore does not have powers to issue NTD in relation to a paedophile manual found on the open internet but it does report to NCA.
<b>Declaration of committing CSA</b>	Not illegal (dependent on context)	Notice to LEA.	<p>There are now case law examples of individuals being prosecuted for possession of NPI.</p> <p>Report to NCA where information provided indicates a genuine declaration and would be providing them with helpful intelligence.</p>

Context	Legal Status	Actions Taken	Comments/explanation
Images in a medical context	Not treated as CSAM	Notice to LEA.	The hotline makes assessments in an online context. If collections of such images were found to be in possession of an offender, then this may influence a police investigation and possible prosecution.
Non-explicit images in a series of images that contain CSAM	Not treated as CSAM		Where images relate to a known series, it could not be a completely innocuous image - i.e. if the child is fully clothed even if the hotline knows further along the series there will be CSAM images.  The hotline is likely to be less strict however with category C content where it knows the images are part of a set.
Non-explicit images that have comments or captions of a sexual nature attached to them	Not illegal and not treated as CSAM.	Notice to LEA	If appropriate and sufficient details available an 'Intelligence' report may be passed to the NCA if the hotline believes that it is possible to identify a person and that there is risk of harm to a child.

Content Location	Accessibility by law	Actions taken	Comments/explanation
Private site types (Password protected)	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	If passwords are made available or are otherwise publicly accessible, the hotline will review content behind password protected services and action if appropriate to do so.
Peer to peer (torrent, emule, Kat)	Not allowed to access or send NTDs.		This is currently an operational area reserved for UK law enforcement.
Dropbox/cloud/similar file hosting services	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	
Tor/Onion	Allowed to access.	Notice to LEA.	All previously unidentified (new) Tor sites are notified to the NCA.
Livestreamed CSE/CSA	Allowed to access. Allowed to send NTDs.	Notice to LEA.	Where livestreaming of CSAM is happening and the hotline comes across it at the time, the IWF reports it to the NCA as it happens and capture evidence to document the event. Any captured evidence can then be shared with the NCA if required to assist with any onward investigation.
File Transfer protocol (Ftp://)	Not allowed to access or send NTDs.		
Social media accounts	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	If the CSAM is publicly available.
Email	Not allowed to access or send NTDs.		
Usenet	Allowed to access. Allowed to send NTDs.	Notice to LEA. NTD to HPs.	Where CSAM found, NTD process is followed.
Messengers (Telegram, WhatsApp)	Allowed to send NTDs.	Notice to LEA. NTD to HPs.	Only where the content is accessible without joining a group. i.e., some telegram content can be viewed online freely without joining. Private encrypted messages (WhatsApp etc) are not accessible by the IWF and out of scope.

## *United States - CyberTipline*

### **Legal basis for operation:**

Allowed by law.

### **Relationship with Law enforcement:**

CyberTipline works closely with the Internet Crimes Against Children Taskforces (ICACs) and sends them the majority of the CyberTipline reports that it is able to determine a location for. The hotline also works closely with Federal law enforcement.

### **Relationship with hosting providers:**

CyberTipline works closely with HPs located within the US. The hotline sends direct notices when it can determine that content on their site is illegal. The hotline does not get feedback after the notice is sent out, but it does check to make sure that the content has come down and will send a secondary notification if the content is still up.

### **Other content dealt with:**

CSAM, online enticement, child sexual molestation, child sex tourism, child sex trafficking, misleading domain names, misleading words or digital images on the internet, unsolicited obscene material sent to a child.

### **What age constitutes a child:**

It depends on the state. Each state sets that age.



Content Type	Legal Status	Actions Taken	Comments/Explanations
Drawings/manga/artistic interpretations of CSAM	Not illegal (dependent on context)	Notice to LEA.	It depends on the jurisdiction if these images are illegal. Most law enforcement in the US will not charge someone if they have just these images.
Digitally generated CSAM/realistic images representing a minor engaged in sexually explicit conduct	Not illegal (dependent on context)		
A minor appearing to be an adult engaged in sexually explicit conduct	Illegal	Notice to LEA. NTD to HPs.	
An adult person appearing to be a minor engaged in sexually explicit conduct	Not illegal	None	
Child grooming	Not illegal (dependent on context)	Notice to LEA.	
Sexual extortion of children or soliciting children for sexual purposes	Not illegal (dependent on context)	Notice to LEA.	
Apparent self-generated sexual material	Illegal	Notice to LEA. NTD to HPs.	
Sexualised modelling or posing	Not illegal		It would be illegal if it meets the threshold for what is illegal in the US.
Sexualised images of children	Not illegal (dependent on context)		It would be illegal if it meets the threshold for what is illegal in the US.
Text depictions of CSAM	Not illegal	None	
Fictional text depictions of CSAM	Not illegal	Notice to LEA.	
Praise of paedophilia or CSA	Not illegal	Notice to LEA.	
Manual on CSA	Not illegal		
Declaration of committing CSA	Not illegal	Notice to LEA.	

Context	Legal Status	Actions Taken	Comments/explanation
Images in a medical context	Not illegal	None	
Non-explicit images in a series of images that contain CSAM	Not illegal but treated as CSAM.	NTD to HPs.	If these images depict nudity or do not meet the US definition of child pornography, the hotline will send its Exploitative notification so that HPs are able to remove but are not required to report back into the CyberTipline.
Non-explicit images that have comments or captions of a sexual nature attached to them	Not illegal and not treated as CSAM.	NTD to HPs.	CyberTipline will notify the HP of these types of comments.

Content Location	Accessibility by Law	Actions Taken	Comments/explanation
Private site types (Password protected)	Not allowed to access or send NTDs.		CyberTipline is only allowed to access publicly available sites/content. For these types of reports CyberTipline accesses and documents what is publicly viewable. If there is no CSAM on the site it marks the report Unconfirmed.
Peer to peer (torrent, emule, Kat)	Not allowed to access or send NTDs.		
Dropbox/cloud/similar file hosting services	Allowed to access.	Notice to LEA.	If the content is available to the public, CyberTipline can access these sites but if the folder is password protected it is not allowed.
Tor/Onion	Allowed to access.	Notice to LEA.	Same as above. If content is viewable when CyberTipline accesses, it sends a notice.
Livestreamed CSE/CSA	Allowed to access.	Notice to LEA.	CyberTipline will notify LEA if it accesses the URL, and the livestream is still occurring.
File Transfer protocol (Ftp://)	Unknown		
Social media accounts	Allowed to access.	Notice to LEA.	Again, only if the content is publicly viewable. CyberTipline does not access accounts with passwords (even if it is given them by a reporting person).
Email	Not allowed to access or send NTDs.		
Usenet	N/A		
Messengers (Telegram, WhatsApp)	Allowed to access.	Notice to LEA.	If the chat/content is publicly available, CyberTipline will view it. If the reporting person gives the hotline a copy of the chat logs it uses those. Otherwise CyberTipline does not access it.

# Abbreviations

- CSAM: Child Sexual Abuse Material
- CSEM: Child Sexual Exploitation Material
- CSA: Child Sexual Abuse
- NTD: Notice and Takedown
- HP: Hosting provider
- LEA: Law enforcement agency
- MOU: Memorandum of Understanding
- ICCAM: INHOPE's secure software solution to collect, exchange and categorise reports of child sexual abuse material.
- ICAC: International Crimes Against Children
- IP: Internet Protocol
- NPI: Non-photographic child sexual abuse material
- EC: European Commission
- SIC: Safer Internet Centre

Illegal content broken down by country  
Legend: an 'x' signifies that the content is illegal. 'y' signifies the legal status is dependent on context.

Country														
Country	Content Type													
Country	Drawings/manga/artistic interpretations of CSAM	Digitally generated CSAM/realistic images representing a minor engaged in sexually explicit conduct	A minor appearing to be an adult engaged in sexually explicit conduct	An adult person appearing to be a minor engaged in sexually explicit conduct	Child grooming	Sexual extortion of children or soliciting children for sexual purposes	Apparent self-generated sexual material	Sexualised modelling or posing	Sexualised images of children	Text depictions of CSAM	Fictional text depictions of CSAM	Praise of paedophilia or CSA	Manual on CSA	Declaration of committing CSA
Australia	x	x	x	x	x	x	xy	xy	xy	xy	xy	xy	x	x
Austria		x		x	x		x	x	x			x	xy	
Belgium	x	x	x	x	x	x	x	xy	xy	x	x		x	xy
Bosnia			x			x								x
Bulgaria	x	x	x	x	x	x	x							xy
Cambodia	xy	x	x	x		x	x	xy	xy	xy	xy		x	x
Croatia	x	x	x	x	x	x	x	xy	xy	xy	xy	xy	xy	xy
Czech Republic	xy	x	x	x	x	x	xy		xy		xy	xy	xy	
Colombia	x	x	x	xy		x	x	x	x					
Denmark		x	xy		xy	x	xy	y	y	y		xy	xy	xy
Estonia	x	x	x		x	x	x	xy	xy	x	x		x	x
Finland			x		x	x	x	y	y					y
France	x	x	xy	xy	xy	xy	x	xy	xy				x	x
Germany	x	x	x	xy	x	x	xy	x	xy	x	x	xy	xy	xy
Greece	x	x	x		x	x	xy	x	x					
Hungary			x		y	x	xy					xy	xy	xy
Iceland	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Ireland	x	x	x		x	x	x	y	y	x	x		y	y
Italy	y	x	x	y	x	x	xy	y	xy	xy	xy	x	xy	xy
Japan		y	x		y	xy	x	y	y					
Latvia	x	x	x	y	x	x	x	x	x	x	x	x	x	x
Lithuania	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Luxembourg		x	x	x	x	x	x	x	x	x	x		x	x
Malta	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Netherlands	xy	xy	x	xy			x	x	x					
Poland	x	x	xy		x	x	x			x	x	x	x	x
Portugal	x	x	x		x	x		xy	x	xy	xy	xy	xy	xy
Romania		x	x	x	x	x	x							
Russia	x	x	x	x	x	x	x	x	x			x	x	x
Slovenia	x	x	xy	xy	x	x	xy	x	x	x	x		x	xy
South Africa	x	x	x	x	x	x	xy	xy	xy	xy	xy	xy	x	x
Sweden	x	xy	xy		x	x	xy	x	x					xy
Turkey	x	x	xy	xy	x	x	xy	xy	x	y	y	y	y	y
United Kingdom	x	x	x		x	x	x	x					x	y
United States	y	y	x		y	y	x		y					
	Illegal: 22	Illegal: 27	Illegal: 27	Illegal: 14	Illegal: 26	Illegal: 30	Illegal: 22	Illegal: 14	Illegal: 14	Illegal: 11	Illegal: 11	Illegal: 8	Illegal: 15	Illegal: 13
	Illegal dependent on context: 3	Illegal dependent on context: 2	Illegal dependent on context: 6	Illegal dependent on context: 6	Illegal dependent on context: 2	Illegal dependent on context: 2	Illegal dependent on context: 11	Illegal dependent on context: 9	Illegal dependent on context: 9	Illegal dependent on context: 6	Illegal dependent on context: 7	Illegal dependent on context: 8	Illegal dependent on context: 8	Illegal dependent on context: 10
	Not illegal dependent on context: 2	Not illegal dependent on context: 2		Not illegal dependent on context: 2	Not illegal dependent on context: 3	Not illegal dependent on context: 1		Not illegal dependent on context: 5	Not illegal dependent on context: 5	Not illegal dependent on context: 2	Not illegal dependent on context: 1	Not illegal dependent on context: 1	Not illegal dependent on context: 2	Not illegal dependent on context: 4

# Illegal content broken down by country

Legend: an 'x' signifies that the content is illegal. 'y' signifies the content is treated as CSAM. 'z' signifies the legal status is dependent on context.

		Content Type	
Country	Images in a medical context	Non-explicit images in a series of images that contain CSAM	Non-explicit images that have comments or captions of a sexual nature attached to them
Australia		y	y
Austria			
Belgium			x
Bosnia			
Bulgaria			
Cambodia		y	
Croatia	x	x	x
Czech Republic			x
Colombia	y		
Denmark	y	y	
Estonia		y	y
Finland			y
France		y	z
Germany		z	z
Greece			
Hungary		y	
Iceland		y	
Ireland			
Italy	y	x	x
Japan			
Latvia		x	x
Lithuania		y	y
Luxembourg	y		xy
Malta			x
Netherlands	z	x	z
Poland			
Portugal	x	y	xy
Romania		y	y
Russia			
Slovenia			
South Africa	z	z	z
Sweden	y	x	
Turkey		y	y
United Kingdom			
United States		y	
	Illegal: 2	Illegal: 5	Illegal: 6
	Treated as CSAM: 5	Treated as CSAM: 12	Illegal & treated as CSAM: 2
	Dependent on context: 2	Dependent on context: 2	Treated as CSAM: 6
			Dependent on context: 4

Content location accessibility broken down by country

Legend: an 'x' signifies that the hotline is allowed to access the content location. 'y' signifies the hotline is allowed to send NTDs based on content in the location. 'z' signifies the status is dependent on context.

Country	Content Type									
	Private site types (Password protected)	Peer to peer (torrent, emule, Kat)	Dropbox/cloud/similar file hosting services	Tor/Onion	Livestreamed CSE/CSA	File Transfer protocol (Ftp://)	Social media accounts	Email	Usenet	Messengers (Telegram, WhatsApp)
Australia	xy	xy	xy	xy	xy	xy	xy		xy	
Austria		x	xy	x	x	xy	xy		xy	x
Belgium			x	x	x		x	x	x	x
Bosnia	x	x			xy	xy	xy		xy	xy
Bulgaria	x	x	x	x	x	x	x	x	x	x
Cambodia	xy	xy	xy	xy	xy	xy	xy	xy	xy	xy
Croatia										
Czech Republic	xy	xy	xy	xy	xy	xy	xy	xy	xy	xy
Colombia	xy	xy	xy	xy	xy	xy	xy	xy	xy	xy
Denmark	xy	xy	xy	xy	xy	xy	xy	xy	xy	xy
Estonia				x	x					
Finland			xy	x	x		xy	x	x	
France	xy	xy		x	xy	xy	xy		xy	xy
Germany	xy	x	xy	x	xy	xy	xy	x	xy	x
Greece	xy	xy	xy	xy	xy	xy	xy	xy	xy	xy
Hungary					x		x			
Iceland										
Ireland	xy	xy	xy	x	xy		xy		xy	xy
Italy										
Japan	xy		xy		xy	xy	xy			
Latvia	xy			xy	xy	xy	xy			
Lithuania	xy		xy		xy	xy	xy		xy	
Luxembourg			x	x			x			x
Malta	x	x	x	x	x	x	x	x	x	x
Netherlands	z			y	y		y			y
Poland	x		x	x	x	x	x	x		x
Portugal										
Romania	xy	xy	xy	xy	xy	xy	xy		xy	xy
Russia	xy		xy		xy		xy	xy		
Slovenia				xy	xy		xy		xy	xy
South Africa	xy	xy		x	xy	xy	xy		xy	xy
Sweden	xy		xy	x	xy	x				
Turkey	xy		xy	x	x	x	xy	xy		xy
United Kingdom	xy		xy	x	x		xy		xy	xy
United States			x	x	x		x			x
	Allowed to access: 2	Allowed to access: 2	Allowed to access: 6	Allowed to access: 14	Allowed to access: 11	Allowed to access: 5	Allowed to access: 7	Allowed to access: 6	Allowed to access: 4	Allowed to access: 4
	Allowed to access & send NTDs: 10	Allowed to access & send NTDs: 6	Allowed to access & send NTDs: 17	Allowed to access & send NTDs: 8	Allowed to access & send NTDs: 18	Allowed to access & send NTDs: 15	Allowed to access & send NTDs: 21	Allowed to access & send NTDs: 7	Allowed to access & send NTDs: 16	Allowed to access & send NTDs: 5
	Dependent on context: 1			Allowed to send NTDs: 1	Allowed to send NTDs: 1		Allowed to send NTDs: 1			Allowed to send NTDs: 1