Chapter 6

Logistics and team

Once the legal, political, and operational framework of a new hotline is agreed upon by all national stakeholders, the logistics of hotline development, including hardware, software and physical location are relatively straight-forward.

6.1 Technical infrastructure of the hotline

A snapshot of the existing network of hotlines demonstrates that there is no single model of hotline. They represent diversity of size, sector, and coverage.

6.1.1 Hardware needs

For start-up initiatives, the basic requirements for hardware include:

- ✓ Computer with internet access, ideally using a dedicated fixed IP address.
- ✓ Server for the website used to receive reports from the public.
- ✓ Separate server or computer for the local Report Management System (RMS).

6.1.2 Software

- Report Management System (RMS) such as Report Box please see <u>Chapter 2</u> for more information.
- Regardless of the size of the hotline or the volume of reports, a hotline needs to implement a database or Report
 Management System (RMS) for tracking and handling reports. The RMS will vary in size and complexity
 according to the hotline.

An RMS can be created using:

- Standard software such as MS Access.
- o Bespoke software already in use and transferable from another hotline or developed for the new hotline.

The RMS may allow for reports to be referred directly to law enforcement and industry partners. It is also an option to provide these partners with direct access to reports marked for their attention in a secure environment. If reports will be referred manually and outside the secure environment of the RMS, careful consideration must be given to how this happens. Confidential information for law enforcement or a hosting provider should be shared in a secure way. One option is to send encrypted information via email.

Investigation tools

INHOPE offers training for members and new hotlines on a range of topics relevant to the management of reports. This includes tracing IP addresses and websites using a variety of open-source tools.

The following are examples of the types of tools used by hotlines:

- Whois to look up domain names.
- <u>Visualroute</u> to look up IP address routing.
- Robtex provides AS number and ISP.
- <u>Ip2location.com</u> provides a map of the IP address in use <u>Central Ops Net</u> and <u>Domain Tools</u>.

As a matter of best practice, when determining domains, at least two different tools should be used, and if they return different information, then additional tools should also be used.

6.1.3 Security

It is important to have firewalls and a very good anti-virus system in place, which should always be working. Computers which are used for viewing illegal images should be checked/scanned regularly (at least once a month). A good example of an open-source tool for 'cleaning' the computer is Cleaner. Some hotlines also use a software virtual computer to protect their own computers from being infected by malware when viewing suspect sites.

Additionally, hotlines could consider setting up a 'Tor' network or equivalent when they are accessing sites containing illegal content. This will prevent the visited sites from accessing the hotline's internet connection and learning its physical location

6.2 INHOPE – International Report Management System

ICCAM

For INHOPE members, INHOPE provides access to an international RMS/technology platform to enable the exchange of illegal material between more than 40 jurisdictions. The use of the system also reduces the duplication of reports across the INHOPE network. It also produces unique statistics on the proliferation of images of child sexual abuse on the internet.

Additionally, INHOPE's systems provide content matching capabilities that identifies previously assessed images and videos and makes relevant information available to INTERPOL. INTERPOL actively cooperates with the INHOPE platform by downloading the hotline reported CSAM.

Previously unknown images are uploaded by INTERPOL into the ICSE database with the aim of identifying victims and referring cases to appropriate national law enforcement. Currently, 64 INTERPOL member states and EUROPOL are

connected to the ICSE database, and they collectively work to identify victims. Cases are shared through the INTERPOL secure network to the non-ICSE database connected countries when necessary. INTERPOL is always working to establish connections with additional national law enforcement agencies.

6.3 Office set-up and controlled access

The workstation of a hotline analyst should be positioned so that no one can see their computer screen/monitor by accident. Ideally, the work should take place in a room that has a door which can be locked, and a warning sign (e.g., "knock before entering") should be placed on the outside, to prevent inadvertent exposure to illegal content. Only authorised and trained staff members can enter the room. It is important that no sound can be heard from the computers on which illegal material is being assessed. And that the room's windows have blinds or curtains so no one from outside can view the screen of the computer.

6.4 Hotline staff

The introduction of a hotline for the assessment of reports of online child sexual abuse material has implications for the parent organisation. Close attention must be paid to:

- 1. The specific legal issues concerning the management of child sexual abuse material in its country of operation.
- 2. The technological dimensions of content distribution and storage.
- 3. The crucial nature of international cooperation and timely report referral.
- **4.** The sensitive nature of the subject matter.
- 5. The selection, training and support of staff who will process reports.

The learning curve of the hotline in each of these areas will depend on the nature of the parent organisation. For example, if the organisation and staff have experience dealing with the sexual exploitation and abuse of children, it may be that more attention will be paid to technical issues at the start. If the parent organisation is operated by an industry or government body, closer attention may be paid at the start to the recruitment and training of staff to deal with child sexual abuse material. There may be a higher starting level of technical and legal knowledge in this case. Whatever the case, building a strong and capable team is

one of the most important aspects of setting up the hotline.

6.5 Team: Structure and recruitment

The number of staff needed to operate a hotline will depend upon several elements:

- 1. The expected or existing volume of reports to the hotline. For example, an organisation may decide to implement a hotline in response to unsolicited reports of online CSEA from the public, in which case initial estimates of volume can be made. However, if a hotline is established as an evidence-based response to online CSEA, it will not always be easy to predict how quickly and at what volume reports will be sent to the hotline. Whichever the case, it is advisable to start small.
- 2. The initial team should consist of:
 - The equivalent of one full-time content analyst, which can be covered by two content analysts each working part-time (e.g. 2.5 days each) on reports of suspected CSAM, as part of their overall activities.
 - One hotline manager who may carry out report analysis but is also responsible for overseeing the policy,
 operations and possibly also the communications of the hotline service.
- 3. The arrangements in place to hire staff for the hotline. Depending on the funding and existing infrastructure available for the hotline, the organisation may be required to launch the hotline with staff already in place. If this is the case, specific training and support must be provided to hotline analysts, even if they are experienced in the issues, and consideration must be given to guidelines on the welfare of hotline staff.

6.5.1 Content analyst(s)

The volume of reports handled by existing hotlines in the INHOPE network is varied. In the region of 1000 reports in the first year of operation would be considered a promising start. No content analyst should be required to work full-time on reports of CSAM. Indeed, they are advised to split their time between being a content analyst and another role within the organisation. A typical content analyst will be able to deal comfortably with 100 reports a week which means that only one content analyst (analysing content part-time) will be required to get the hotline facility up and running.

The organisation running the hotline will need to monitor the workload of hotline staff and make a decision about additional staff according to resources available. However, in a fully functioning hotline, the 'tipping point' at which another analyst should be hired is when enough reports are coming in that they cannot be dealt with within 24–48 hours of receipt. Attention to report management time is also important for the rapid removal of child sexual abuse material at source. This may mean referral to law enforcement and/or an Electronic Service Provider in the hotline of the country, or referral to a hotline in another country. Quality and speed of report management are essential to the success of a hotline.

When hiring the first analyst(s), it is worth looking for an individual who has the potential to become the lead analyst/hotline manager as the organisation grows. When starting off, it is likely that the first content analyst will have excess capacity and will therefore also be able to manage additional tasks – so the job description should take this into account. From a psychological wellness perspective, the organisation should ensure that the content analyst also has responsibilities within their workload that are not related to the content analysis, whether administrative or other.

6.5.2 Recruitment Selection

In general, a content analyst should have the following experience:

Technical

Ideally, a basic interest in and understanding of how websites and content distribution over the internet works and the fundamentals of online security/personal security on the web. However, they do not need to be a technical expert. INHOPE can provide access to online training for orientation in this area.

Legal

Able to assimilate and apply the relevant legislation of the country and the specific guidelines laid out for the hotline for classifying content and managing reports. The person should also be comfortable presenting to stakeholders such as law enforcement. This will include the ability to describe and discuss graphic content in a factual and pragmatic tone.

Subject-matter

Experience with some aspect of combatting child sexual exploitation is not essential but can be very beneficial to the ability of the analyst to interpret the work of the hotline in its wider context. For example, a person with experience dealing with child victims and working with the national government to prevent and respond to child sexual exploitation and abuse is in a good position to 'transition' towards a focus on these issues in the online context. In this case, training in the technical aspects of content distribution over the internet and in the management of reports can be provided to support that transition.

Personal

In addition to any specific knowledge of the topic, the person should have some life experience and maturity. Experience shows that new graduate recruits have been shown to have higher turnover than more mature recruits. However, avoid making other assumptions about potential recruits. For example, experience from several hotlines has shown that young mothers returning to work can be very successful content analysts – even though it may be tempting to assume that such a role might be too 'traumatic' for them. This is not necessarily the case.

6.5.3 Interviews

In terms of assessing the candidate's temperament for the job, the interviewer's personal instinct plays a valuable part. Ask questions like "why do you want to work in this field?" and "how do you think you will cope with the reality of looking at images of children being sexually abused?" and look for measured and realistic responses.

The final stage of recruitment should also be used to give the candidate the opportunity to find out for him or herself whether they are temperamentally suited to the role. Even if the candidate has experience working on the topic, it is important for him/her to consider the specific nature and demands of content analysis.

Once the preferred candidate for the role has been selected, all available police and background checks should be carried out. Depending on the employment laws in the country of operation, the organisation can consider giving the candidate a temporary contract acknowledging that they understand the nature of the content they will be viewing and assessing.

After an offer is made, the candidate should then be invited to spend an hour in a room with an experienced analyst or law enforcement officer. They should be exposed to the type of content and images that they would be examining in their day-to-day role as a hotline content analyst (including extreme adult material and content involving children of different ages). It is not necessary to ask the candidate to describe the acts/activities depicted at this stage. However, it is important that they are exposed to real content (which is discussed with the senior analyst). This could include relevant information that would be noted during a standard investigation of a report, e.g.: "What can you see on the shelf behind the child?"; "What type of plug socket is that?" etc.

In the case of new hotlines, the content analysts should visit their national specialised law enforcement unit and/or an experienced hotline after recruitment. It should be made clear to the candidate that they are being offered the job, but that this session is their opportunity to be sure that they definitely want to accept it. Carry out this final 'working session' at the end of the working week and give the candidate the weekend to think it over – ask them to call with their decision on the Monday or Tuesday once they have reflected fully. Experience suggests that most candidates will go on to accept the job, but some will recognise that they are not suited to the role at this stage.

Indeed, deciding to work as a content analyst is a decision that must be made willingly. Even if the organisation offers the candidate a short period of reflection, there are cases where a new content analyst decides after several weeks or months of work that they do not wish to continue. It is important that the employer provides a non-judgmental environment and where possible, can offer the employee alternative work within the organisation.

For further guidance, see the INHOPE Principles for the Recruitment of Hotline Staff here.

6.5.4 Communications manager

The communications manager ensures that the hotline is public facing. If the public is not aware of the hotline or its role and why citizens should report, there will be no reports. This person's role is to promote the work of the hotline and raise awareness of its existence and role. Their role also should focus on building and maintaining a strong working relationship with industry generally and key service providers in particular. INHOPE's Communications Department works with you to help guide and develop campaigns as you start the process of becoming an INHOPE hotline.

Ideally, the individual will need to be a strong communicator and feel comfortable dealing with a range of external stakeholders including government and regulatory representatives. They will need to have a good grasp of related policy and legislative issues, although will not need to be trained in content analysis. This person is also likely to manage the administrative aspects of the hotline – for example, managing funding processes, developing policies, keeping abreast of changes to legislation or changing standards / interpretations of existing legislation.

This person may also need to represent the organisation in international meetings and capacity building workshops, sharing good practices, and emerging challenges. By constantly engaging with relevant stakeholders, it is possible to keep abreast of the latest international developments too. Through INHOPE's newsletters you will also be kept up to date on developments.

In many cases, the hotline service will be part of a wider range of activities carried out by the parent organisation. In this case, existing communications capacity and experience should be applied to the promotion of the hotline. This will likely require some training, and the hotline will benefit from interaction with experienced hotlines.

6.6 Training

Once the analyst has been hired, they will need to be thoroughly trained. The training period will depend on the complexity of local law and the technical knowledge of the analyst.

In the case of new hotlines, the analyst will often be learning and developing along with the hotline service itself. This reality emphasises the need for close cooperation with law enforcement and industry partners from the start so that mistakes can be addressed as part of the learning process. In the beginning, quality of assessment should be prioritised over speed of assessment. This is important particularly because accurate content assessment by a hotline is fundamental to its ability to build trust with the public and key stakeholders, and to cooperate effectively with the international network of hotlines.

The following options are possible for training at the start and throughout the life of the hotline:

• Training by the local specialised law enforcement unit – ideally this will happen in the first few weeks and will continue as regularly as possible.

After initial training by law enforcement, the analyst should begin responding to reports coming in through the hotline. For the first few weeks, the analyst should either look at all reports together with an experienced law enforcement officer or send the URL and their initial assessment to the officer for his appraisal. As the analyst's skills and confidence grow, and the law enforcement unit sees the accuracy and value of the hotline's work, this process can be phased out and the analyst can begin to work more independently.

Naturally, the analyst should continue to liaise closely with law enforcement colleagues – not just during the training period – particularly for consultations on 'borderline' images (i.e., where it is not a clear decision whether the image is illegal or not). Consider involving your local law enforcement contact in the recruitment process. This is partly to take advantage of their experience and judgement, partly to ensure that they will be able to work successfully with your preferred candidate, and finally, so that they can take them through the final stage of the interview process which will involve them looking at real examples of illegal content.

By six months, the analyst should be analysing images competently. If after this probation period, they are still failing to reach the right decisions and gather the correct information, then they are probably not the right person for the job and an alternative should be sought. Close contact and ongoing monitoring by law enforcement will enable the analyst's judgement to be tracked. Analysts will also need to keep abreast of changes to legislation and changing attitudes/interpretations of existing legislation.

- Joint hotline and law enforcement training by an international law enforcement partner or affiliated partner this should not substitute but will certainly complement local training. It is also a very useful way to build an international network for the hotline.
- Training by an experienced hotline analyst in an existing hotline within the INHOPE network peer-led training will help orient the new analyst in their work, and experienced analysts are best placed to answer questions and solve issues that are specific to hotline work.
- **Training by INHOPE** INHOPE offers a range of online and face-to-face training for its members but can also devise a programme of training for staff at new hotlines; For more information, see INHOPE's Training Policy.

• Training by a local or international industry partner – this form of training will not only help the hotline analyst understand the perspective of industry and the way different technologies are used to exploit children, but it will also help the hotline build its relationship with its industry partners as key allies in its work.

6.7 Team support and safety

6.7.1 Legal support

It is critical to ensure that employees have the necessary permission to do their jobs, and that they and the parent organisation have protection when carrying out the activities of the hotline.

The nature of protection and authorisation needed will depend on several factors, in particular the specifics of the national legislation with regard to the viewing, possession, and storage of child sexual abuse material. However, the hotline should seek written confirmation from government and/or law enforcement that they are allowed to look at and process illegal content. Ideally, a written agreement with the authorities will detail the role and mandate of the hotline.

6.7.2 Physical safety

Whether an industry, civil society or governmental entity, the hotline's parent organisation will likely have existing security procedures in place that can be adapted to cover the specifics of the hotline's activities.

Some of the issues to consider include:

- The accessibility of the office to unexpected visitors and people with a potential interest in accessing the sensitive material processed by the hotline and/or the organisation.
- The accessibility of the dedicated hotline space / room to unauthorised external and internal visitors.
- The ability of people making reports about online child sexual abuse material, or people wanting to complain about an action taken by the hotline in relation to these reports, to identify analysts.

Minimise contact with people who have made reports. Many will use the option to make an anonymous report and will not seek to engage further with the hotline. However, some reporters may wish to engage with the hotline, request feedback, or ask more general questions. One way to minimise this engagement is to provide comprehensive information on the hotline's website, and to develop a Frequently Asked Questions (FAQ) section.

When designing the web-form, it will be possible to direct the reporter to this section once they have filed their report, or to send an automatic reply in the case that a report is submitted via email.

The level of detail is up to the individual hotline, but if the reporter did not submit anonymously and has provided their contact details, the reporter could be informed that:

- The hotline has received the report.
- How the report will be processed.
- What will be done with the report.

If the hotline does offer feedback on request and therefore needs to make contact with the reporter, email is the best option. It is a reasonable assumption that if someone has access to the internet, they will also have access to an email account. However, when analysts do enter into email contact with reporters, they should send from a general account such as 'info@xxxx.com' and should not give out real names. Their sign-off should use only their initials or the name of the organisation.

If the hotline does provide a telephone reporting or general information service, identifiable personal contact should be avoided. Given the format and length of many URL names, and the fact that reporters will come across URLs with CSAM when surfing the internet, the use of the web-form should be the preferred option. This should also be encouraged by the hotline on its website. However, if a telephone service does exist, the hotline should use an answer phone service with a message such as: "Please leave the URL you would like to report. Unfortunately, we are not able to call you back." The hotline should not have a telephone relationship with people reporting content.

6.7.3 Psychological support

The work of a content analyst will by its nature be impactful. However, the extent and nature of this impact can be reduced when an analyst understands the importance of their work and feels supported by the hotline manager, colleagues, and the parent organisation in general.

Advice on support for hotline content analysts and staff includes:

- The environment in which content is analysed is important and should be as relaxed as possible.
- Analysts should be encouraged to discuss what they are looking at. Often the act of merely viewing a disturbing image with a colleague can help alleviate stress.
- Analysts should feel free to talk about anything and even joke and chat with colleagues as a common way to alleviate stress when viewing content.
- They should be given the opportunity to have the radio on, and go for breaks as necessary.
- Of particular importance is that the analyst must never be alone in a room looking at images of child sexual abuse and other traumatic content. Even if the analyst is not sharing the image or showing it to a colleague, it is extremely valuable to be able to express one's shock to another person in the room and have their support and empathy should the need arise. Simply having someone else in the room when viewing distressing content can

help to create an atmosphere of normality whilst witnessing images of events and situations that are potentially horrifying. If the hotline has a team of analysts, the problem should not arise because a peer-support structure should naturally take shape. If, as in the model outlined above and common to new hotlines, there is only one analyst and one other employee, the analyst should factor this into their workload planning. If working alone for a longer period of time and on a regular basis, the analyst could:

- ✓ Use information provided by the report such as the URL plus the description of the type of content, to plan their workload and balance assessment of non-traumatic content with more traumatic content. For example, if the hotline accepts reports relating to issues other than child sexual abuse material, such as reports of the written word that may potentially be illegal under the local legislation (e.g., racism, xenophobia), they could focus on these reports for a period of time.
- ✓ Set aside a certain amount of time to deal with administrative or other tasks assigned to them that do not involve contact with any reports of online content.

6.7.4 Peer-support

Whatever the case, all colleagues of content analysts should be encouraged to pay attention to each other's behaviour and changes in that behaviour. Some indicators of heightened stress or trauma in an analyst could include:

- Slower work than other colleagues.
- Taking longer breaks than previously.
- Not taking part in general office chatter and humour.

6.7.5 Formal support

Hotline staff should be required to speak with a psychology professional every three months. They should also have access to their counsellor between scheduled appointments on the basis of need. Any additional visits to the counsellor should be entirely confidential and access should be organised in a way that the analyst does not need permission from a line manager. If the hotline does not have access to a psychologist and needs to identify a suitable candidate, it is worth considering involving the staff in the recruitment process and allowing them to choose the person themselves. It is critical that the staff can trust and communicate comfortably with the appointed counsellor. Potentially suitable counsellors could include those who have previous experience of working with people exposed to traumatic situations such as policemen, firefighters, and emergency response teams.

Even if the hotline employs a psychologist as one or more of its analysts, an independent psychologist will be important to encourage staff to discuss any issues affecting them. The counselling should be offered and paid for by the organisation operating the hotline.

For further guidance, see the INHOPE Best Practice Paper Staff Welfare 2020 here.

One of the hard/essential requirements to be checked during the Quality Assurance Programme visit is to keep the hotline physically separated from other activities within the organisation. For example, there must be a separate room to which only hotline staff have access.

Other useful tips from hotlines include:

- Keep the hotline separated from other activities within the organisation. For example, have a separate room to which only hotline staff have access.
- Use a separate secure line for hotline internet access.
- Change the passwords and/or codes needed to access the hotline room/computer regularly.
- If possible, use both passwords and an electronic ID.
- If possible, use two screens when working on the hotline. ECPAT Hotline uses one screen for the virtual computer, and one for ICCAM (INHOPE system)/e-mail/regular browser, etc. By doing this, you minimize the risk of opening a reported webpage outside of the virtual computer.
- Set the virtual computer to clear history when powered off and establish a routine for updating the software (including plug-ins and software on the virtual computer).
- Keep the operating system of the hotline separated from the main office environment to protect the hotline's documents.
- Ensure the use of security certifications (https://) on the hotline website.
- Take steps to protect the privacy of content analysts for example, avoid using personal signatures, profile in databases and email address in correspondence with reporters.

6.8 Multidisciplinary approach

Building capacity to combat online child sexual exploitation abuse is not an overnight process, and it requires a broad, holistic, and multidisciplinary approach to the challenges in order to guide and support countries in this process. The online sexual exploitation and abuse of children is a global issue requiring a coordinated and global response. No country, sector or organisation can tackle it alone and INHOPE collaborates with colleagues around the globe to end online CSAM. Below is a list of additional organisations with whom we collaborate and initiatives to which INHOPE has contributed through interagency working groups. We encourage you to look them up and see if there are synergies for you as we work together to establish your hotline.

EMPACT Group of Europol

End Violence Against Children Partnership & Fund

ECPAT research

Child Dignity's Working Group

ICMEC - Child Sexual Abuse Material: Model Legislation & Global Review

<u>The Technology Coalition – Fighting Child Sexual Exploitation Online</u>

African Committee on the Rights and Welfare of the Child

Child Rights Connect - Council of Europe Secretariat

EUROPOL

Instituto Interamericano del niño, la niña y adolescentes (OEA) - English translation possible on the website

International Telecommunication Union

INTERPOL and The International Child Sexual Exploitation database (ICSE)

Office of the United Nations High Commissioner for Human Rights

Save the Children International

Special Representative of the United Nations Secretary General on Violence against Children

United Nations Committee on the Rights of the Child

United Nations Special Rapporteur on the sale of children, child prostitution and child pornography

United Nations Children's Fund (UNICEF)