Operations

The efficiency, accuracy and transparency with which a hotline operates are essential to its acceptance by law enforcement and Industry, and to the trust it builds with the general public.

For the video, please visit http://hotlinedevelopmentguide.org/guide/operations/

Online reporting forms

The main aim of the online reporting form is to capture the URL. This should be a primary consideration when designing the form.

However, if there are additional steps in the reporting form beyond this, there is the potential to gather more useful information. This could include:

- **Theme**: The theme of the content, such as Child Sexual Abuse Material, Child Sexual Exploitation in the Travel and Tourism Sector, Sexual Extortion involving a child, extreme adult content that may be illegal in the country of the hotline. This will depend upon the mandate of the hotline and the categories of reports it is able to accept, which should be made clear to the public on the hotline website. Type of content, such as image/video or written text
- **Site Type**: Type of site / online environment where the material was found

When designing the web form, certain fields can be selected from a menu, while others could allow for free text.

Allowing the reporter to provide additional information to the URL is also beneficial to the hotline because:

- It can help the analyst to prioritise their workload
- Minimise the risk or the time spent looking at traumatic content when they are alone
- If the form is too complicated, has too many steps, and asks for too much information, the reporter may not complete the process. If the hotline does seek additional information to the URL, it should try to:
  - Order the questions by priority, starting with the URL
  - Automatically submit each piece of information as it is entered
In this way, if a reporter does not complete the process, the information that has already been entered is retained by the hotline for assessment.

**Managing reports of illegal content from internet users**

Hotlines should explain clearly how reports will be managed, according to the laws in its country of operation.

For example, INHOPE requires members to communicate how reports will be handled, along the following lines:

“We will assess your report according to the law in our country and if is illegal the location of the reported material will be passed to the police and if it is overseas we will forward it to the relevant INHOPE hotline”.

In general terms, a report will be handled along the following lines:

- A report is received by the hotline.
- The hotline’s analysts will look at their own hotline database to see whether the content in question has already been reported and is in the system.
- If the content has not previously been reported, it will then be assessed for illegality in that particular country.
- If content is found to be illegal under national legislation and hosted in that same country, national processes will commence – in some countries, for example, the relevant ISP will be contacted immediately by the hotline directly and NTD processes will be instigated, in others, the report will go to law enforcement in the first instance.
- If it is found to be illegal under national legislation and hosted in another country, then the information will be cross-checked against the central INHOPE database to see if it has already been reported by another hotline. If the URL and details are found to match something already in the database, then there is no need to report it again centrally. But for the hotline’s for own records, they can note that they have received a report and that the URL in question is being dealt with by the relevant country / hotline / law enforcement agency / etc. It is also possible to go into a central database at a later date to see the status of the content (e.g. content was reported on 7 May by hotline X, removed on 9 May by host in country Y).

However, each hotline and market will have its own specific process that will depend on factors such as the national legislation and the nature of working relations with national law enforcement.
Where possible, it is best practice and sometimes a requirement for hotlines to notify the responsible national law enforcement agency of confirmed instances of illegal content being discovered, regardless of where in the world that content is hosted. In practice this will depend on each country’s law enforcement practices.

A useful practice is to develop a visual representation of how a report is handled by the hotline.

Managing reports of illegal content from industry

Depending on the agreements between the hotline organisation, law enforcement and the local Internet industry, a hotline may also receive reports directly from Industry.

The overall process for managing such reports from industry is similar to the process for managing reports from the general public.

The main difference is that an Industry partner may collect less information from its user. A URL may be the only information reported.

The hotline should work closely with Industry partners and encourage them to:

- Collect, where possible, the same types of information from the reporter (their user) as the hotline tries to collect from people that report through the hotline website
- Pass on reports they receive of content that is potentially illegal and falls within the mandate of the hotline, to the hotline for review. For example, if the reporter has sent through a file of images, these should be forwarded straight to the hotline without being opened. This will spare industry staff the trauma of viewing illegal and extreme content.

The hotline should inform the industry partner with its findings so that:

- The industry partner can communicate the result to the original reporter, if they have committed to do this. The hotline does not need to know the reporter’s name or details. Industry partners can communicate to their users that reports will be passed on to the hotline directly by the partner company without the individual’s details, and that they will be given the outcome of the report by the partner company once it hears back from the hotline. This gives users a sense of extra security if they are concerned about making a report directly to a hotline, or directly to law enforcement.
- In the case that the reported information was assessed by the hotline to be illegal and hosted on the Industry partner’s services, then that company’s Notice and Take Down processes may also commence at that time. The capacity of the hotline to initiate a Notice and Takedown process will depend on the national legislation and the agreement in place with law enforcement.
Other options for receiving reports made through Industry partners

There are examples of where an Industry partner creates a direct link between a ‘report abuse’ button on their platform to the designated national Internet hotline. The means that the reporter is informed of a redirect to the national Internet hotline, and the hotline will receive and assess reports in the same way.

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Analysing findings and trends for evidence-based action

In addition to applying expert assessment to URLs to make sure that child sexual abuse content is removed from public access, national Internet hotlines have an essential role to play in gathering information and helping to identify trends.

Many of the hotlines that have been in operation from many years, such as the UK’s IWF, are now able to provide detailed analyses of trends in online child sexual abuse content. This may include:

- Where the content is hosted
- The nature of the abuse
- The apparent age of the children being abused in the images or videos

This type of information is valuable for:

- Education and awareness-raising among the public, civil society, government and private sector about to the nature and extent of the problem of online child sexual abuse material
- Helping stakeholders in government and the Internet Industry to understand changes in behavior. In turn, this can help support investigative processes and the development of prevention measures. In some countries, this might include the blocking of access to URLs which are known to contain illegal child sexual abuse material hosted in other countries where processes to remove the content are less rigorous.

In this case, the creation of a national Internet hotline is an essential part of a country’s efforts to build a robust national response mechanism. The Model National Response is a good reference point for more information.

When starting out, a new hotline should not expect to generate advanced levels of information.

For reporting purposes in the early years, hotlines should focus on:

- The number of reports received
- The proportion of reports that were found to be illegal after assessment by the hotline
- The number of reports that were passed to law enforcement
The number of report that resulted in Notice and Take Down procedures being instigated in the country of operation of the hotline

If additional statistics are needed by the hotline, it is possible to use those generated by INHOPE, the IWF or the NCMEC.

For hotlines that are a member of the INHOPE global network of hotlines, direct access to the INHOPE technology platform will mean they are automatically helping to generate data. As the hotline become more experienced and its operations increase, it should consider more detailed collection of information. This will support law enforcement investigations in several ways, including:

- Providing information on trends such as 'key words' to search on
- Highlighting the movement of websites using a particular name between ISPs

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