

Chapter 4

# Who operates a hotline?

Before deciding whether it will be feasible and possible to set up a hotline, it is crucial to understand what a 'hotline' is, and what it is not. Applying organisations which are potential hotline operators should not be confused by the terminology and should focus on the function and objectives of internet hotlines in operation around the world today.

'Internet hotline' is the English language term used to describe a diverse range of organisations and frameworks that offer a common service with a shared objective: an online reporting mechanism for the public to make reports of suspected illegal content and activities found on the internet. An internet hotline enables swift action to be taken by the relevant hosting provider to remove this content from public access and refer it to the relevant authorities for appropriate action.

Because of this, a 'hotline' could in fact refer to:

1. The organisation that runs the reporting mechanism (i.e., the hotline organisation).
2. The reporting mechanism itself (i.e., the service offered by an organisation).

It is important for your stakeholders to acknowledge and understand that the hotline offers an anonymous reporting service. This is also a best practice. Internet hotlines are an expert processing channel for suspected illegal digital content. Overall, staff combine legal, technical, and thematic expertise that is both international, because of the nature of the issue, and local due to the supremacy of national legislation and the specificities of the local infrastructure.

When embarking upon a project to establish a hotline, it is therefore essential to have a clear idea of what a hotline can do. This will help to answer some important questions:

1. Which organisation from which sector will run the hotline?
2. What will the structure of this hotline service look like and how will it operate within the local environment of the country?

## 4.1 Established organisation recommended for hotline

To ensure scalability and sustainability, it is strongly advisable to focus on the creation of a hotline as a service integrated into the operations of an existing organisation, whether it be a civil society organisation, an industry-led initiative, or a government agency.

A hotline can be introduced as part of the wider set of activities or services conducted by an organisation. This enables the new service to benefit from the transferable expertise of its host organisation, whether in ICT, child protection or other. It also enables the organisation to operate at a scale that allows it to develop the knowledge and expertise needed

for effective report management. Hotlines in operation today exist in many shapes and sizes and are operated by organisations from different sectors. See the [INHOPE membership page](#) for links to INHOPE members and portals around the world.

In the case of NGO-operated hotlines, a local NGO with experience in child sexual abuse issues is often a strong candidate. Not only do they have a good understanding of the scale of the problem in the particular country and related national legislation, but they may be able to help the developing hotline organisation to navigate law enforcement procedures and find the right contacts within government and industry. They may also have direct experience working with children who have been victims of sexual exploitation and abuse in general and online. While this experience is valuable, an NGO deciding to take on the operation of a hotline should prepare to maintain a clear distinction between victim support and CSAM management.

In a different way, hotlines that operate based on industry membership and with industry funding are a manifestation of industry's commitment to removing CSAM and other forms of illegal content from their platforms and services. Hotlines operated by government agencies or regulatory bodies demonstrate very clearly the commitment of the government to protecting children from abuse and exploitation on the Internet.

### **Be realistic!**

When considering the establishment of an internet hotline, it is advisable to start small and be realistic about the needs in the respective country and the capacity of the hotline organisation at the early stages.

Whatever the case, the organisation that operates the hotline may already be or should aspire to be a:

- National focal point for the reception, triage, analysis, and onward referral of reports to the relevant hosting provider and competent national authorities.
- Expert advice and information point for the public and industry partners on the topic of online child sexual exploitation and abuse, and often online child safety more generally.
- Expert point of contact for the global network of INHOPE member hotlines.

## 4.2 Hotline models

There is no single model for a hotline. Each hotline has been established according to the context and specific circumstances in the country, which means that the optimal choice for a country depends on the local context. However, it is important that the selection of the organisation that will operate the hotline is made based on an objective analysis, and that all stakeholders agree and support the organisation.

Most (about 70%) of the organisations operating hotlines within the INHOPE network identify themselves as non-profit organisations, followed by those within the governmental sector, private sector, academia, associations of internet service providers or other.

In 2021, the global network of INHOPE consists of 46 Hotlines in 42 countries worldwide. Below are a few examples of hotlines operated by organisations in the different sectors:

### **Governmental Sector**

Australia: [Office of the Children's E-Safety Commissioner](#) and [Hotline](#)

Cyprus: [Cyprus Institute of Education, Ministry of Education and Culture](#) and [Hotline](#)

### **Regulatory Authorities**

Lithuania: [Communications Regulatory Authority of the Republic of Lithuania](#) and [Hotline](#)

South Korea: [Korea Communications Standards Commission](#) and [Hotline](#)

### **Industry-based and Industry-membership Hotlines**

Germany: [eco, the Association of the Internet Industry](#) and [Hotline](#)

Ireland: [Internet Service Providers' Association of Ireland](#) and [Hotline](#)

### **Civil Society**

Finland: [Save the Children Finland](#) and [Hotline](#)

Netherlands: [EOKM](#) and [Hotline](#)

Colombia: [Red PaPaz](#) and [Hotline](#)

Japan: [Safer Internet Association](#) and [Hotline](#)

### **Academia**

Poland: [NASK](#) (Research and Academic Computer Network) and [Hotline](#)

Slovenia: Spletno oko (University of Ljubljana, Faculty of Social Sciences) and [Hotline](#)

### **Choose what suits your country best!**

The most suitable model is the one that reflects the circumstances in your country. Some hotlines operate with more than 45 analysts and others with just two analysts. No matter the type of organisation running the hotlines, it is essential that it builds strong collaboration with stakeholders from other sectors as we have laid out in previous chapters. In order to find out where a hotline would be best established in your country, we invite you to reflect on the following, and you will be able to continue the discussion with INHOPE:

- What is the current national strategy in your country concerning CSAM (if any)? Think about the legal framework you currently have in place and if it will be able to address online CSAM.
- Which institutions deal with such material in your country (if any)?
- What are the established connections you can reach out to for support?

## **4.3 Nature of received reports**

When developing a hotline, it is essential to understand:

1. The type and nature of the reports the hotline is likely to receive.
2. How this relates to the action the hotline will need to take in response to confirmed illegal content.

In general, CSAM circulating online and reported to hotlines will be a combination of:

1. Material (images and videos) that has previously been reported to the hotline and/or law enforcement but continues to circulate online in the same or modified form.
2. Material (images and videos) that does not appear to have been seen before by the hotline and/or law enforcement.

Some of the material may have been produced years earlier, while other material may have been produced a matter of days or even hours earlier. The victim and perpetrator seen in the images or video may or may not have been identified.

Therefore, it is crucial that hotline analysts act fast in sharing the data of a CSAM report with their national law enforcement agency as soon as possible. Issuing a Notice and Takedown order either directly to a national provider when the material is hosted in your own country or submitted through ICCAM to another hotline is also key.

In some countries text encouraging or describing sexual abuse is also illegal. In these instances, the hotline does not insert the URL into ICCAM, but they process the URL in their own system and send a Notice and Takedown order to the hosting provider.

#### 4.3.1 Borderless nature of online CSAM

Because of the borderless nature of data exchange and access over the internet, the children depicted in CSAM often have no identifiable link to the country where the report is made. In most countries, it is not the role of the hotline but rather the mandate of law enforcement to draw those links based on information supplied to them through multiple channels, including hotlines – see Victim Identification below.

The overall role of a hotline in this context is to:

- Identify the country where the material is being hosted.
- Ensure that all relevant data is referred via hotline and/or law enforcement channels to the country where the material can be removed and/or investigated through ICCAM (once you are a member of INHOPE).
- Engage with local hosting providers to have the material removed.

#### 4.3.2 Evidence of the crime

When a person sexually abuses a child and then documents the act for future sexual gratification or for sharing and trading with others, 'evidence' of a heinous crime is produced. Law enforcement has an obligation to investigate the crime and rescue the victim. Photographs and films depicting child sexual abuse are not merely online crimes affecting virtual victims; they are documentation or evidence of a real crime involving real people and real suffering.

#### 4.3.3 Victim-centred focus today

Victim identification is an investigative methodology that has emerged in recent decades out of a clear need to act upon child sexual abuse material. This material can be found circulating online or seized by the police from computers and other storage devices. Child sexual abuse material is more likely to show the face of the victims of abuse rather than the abuser. This is a reality that dictates the victim-centred focus of image analysis.

## 4.4 Hotlines supporting victim identification

In some cases, a hotline can receive a report with images and videos clearly showing abuse taking place in the local context (e.g., the language used in the video is the national language, the household looks familiar to the analysts, etc). When this happens, hotline staff can discuss their assessment with national law enforcement partners. When law enforcement receives or seizes suspected child sexual abuse material, they will act according to their national laws and procedures to determine how an investigation can be initiated. At international level, this could mean bilateral or multilateral data exchange through the ICSE Database. This involves a global network of specialised law enforcement officers trained in victim identification and coordinated by INTERPOL.

Since 2015, INHOPE's ICCAM has provided content-matching capabilities that identify previously seen images and videos and makes relevant information available to INTERPOL and ICSE. Globally, experienced organisations operating a national internet hotline may cooperate actively with victim identification processes. A leading example of this is the [National Center for Missing and Exploited Children](#) through its [Child Victim Identification Program](#).