

# The Contribution of Hotlines to Combating Child Pornography on the Internet



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Childnet International is a non-profit organisation,  
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## Abstract

Hotlines are initiatives which receive complaints from users about illegal material on the Internet. They have been established in many countries in Europe, in the USA and increasingly elsewhere. Hotlines are run by different types of organisation - industry, users, child welfare and public bodies. They have varying functions and procedures depending on national legal and social circumstances. As a result of the work of hotlines, many thousands of illegal images of child pornography have been reported and removed from circulation or forwarded to law enforcement for investigation.

International co-operation between hotlines is growing especially through the work of the INHOPE Forum (soon to become an Association). Hotlines are exchanging experience and good practice, supporting the development of new hotline initiatives, looking at ways of exchanging reports of illegal material, and working together to promote awareness of the challenges faced. Financial assistance from the European Commission is helping co-operation.

Paedophiles use of the Internet is changing, with the growth in use of the web and chat for publishing child pornography. Emerging Internet nations may be safe havens for child pornographers. Hotlines are looking at ways of responding to these challenges. The technology for responding is relatively easy, the required co-operation between people is more difficult. Legal and social differences pose particular challenges in clarifying how hotlines can closely co-operate and develop good relationships with law enforcement in order together to combat child pornography on the Internet.

## Introduction

Hotlines are initiatives which have developed since 1996 to respond to the presence of illegal material, especially child pornography on the Internet. There is no single perfect model for who should run a hotline, what precise functions and procedures it should have, and how it should relate to the relevant interests - the Internet industry, users, governments, law enforcement agencies, child welfare groups and indeed other hotlines.

This paper seeks to address a series of issues:

- Why hotlines have emerged as a response to the problem of child pornography on the Internet
- The different kinds of hotlines that exist and how they operate.
- How hotlines are trying to co-operate with each other.
- The challenges which hotlines perceive in combating child pornography on the Internet

First a health warning about the content of the paper - it is my view as the Director of Childnet International rather than the collective view of the different hotline initiatives which we have had the privilege to work with over the last three years. Please forgive me if at times it seems anglo-centric - one of the many lessons we have learned in working with hotlines is that we are all the products of our cultures, social and legal circumstances.<sup>1</sup>

Second, I cannot hope to do justice to the diversity of hotline initiatives and the complexity of issues they face in this short paper. Please do look at the web sites for individual hotlines and the INHOPE site ([www.inhope.org](http://www.inhope.org)) for further details, or come to the workshop on hotlines later today.

Third, a word about Childnet and why we are involved in this area as we do not ourselves run a hotline. Childnet was founded in 1995 as a non-profit organisation based in the UK but working internationally to "promote the interests of children in international communications". We have four main function areas:

- Promoting access to the Internet and quality content for children
- Building awareness of how to enjoy safe use of the Internet
- Policy and Analysis of how the Internet is impacting on children
- Protecting the vulnerable from the negative impact of the Internet.

Childnet has a focus on strategic international initiatives that will make the Internet a better place for children. We work both to get children involved in fun and challenging activities around the world and to make sure they can do that safely. As a child welfare agency we are naturally very concerned to protect

children from abuse, and specialising in the Internet we quickly identified the attractions the medium held for paedophiles as a means of exchanging child pornography and, worse still, contacting and meeting children. Childnet welcomed the establishment of hotlines but urged international co-operation between them. In 1997 we secured funding from the Daphne program of the European Commission for a pilot project to create a forum where hotlines could meet and this INHOPE Forum has gone from strength to strength. Further assistance from a different part of the EC (DGXIII) has helped Childnet and the Forum to examine some of the key policy issues faced by hotlines, and lay the foundation for a more formal Association of hotlines.

## History

It is often commented that an Internet year is like a "dog year" - equivalent to seven human years, because the speed of change is so rapid. It seems strange to talk about the history of hotlines when the first one established dealing specifically with child pornography on the Internet - Meldpunt Kinderporno<sup>2</sup> - dates only to the spring of 1996, just over three years ago. At the same time various groups in Germany were discussing how to respond to illegal material on the Internet there especially in the light of a high profile court case.

This was quickly followed by initiatives in Norway, Belgium and the UK before the end of 1996. Other countries began to take notice and plans for hotlines were being made in Austria, Ireland, Finland, Spain, and France. The issue has been discussed in other European countries as well. In March 1998 the USA launched its "cybertipline" which has quickly become established as one of the busiest and most innovative hotlines. Australia has recently passed legislation which will lead to the establishment of both a community based hotline and a formal publicly run "notice and take down" procedure for illegal content.

## Why were hotlines formed and their numbers expand so quickly?

The factors that seem most pertinent to the rapid growth of hotlines are:

- the Internet is the perfect medium for paedophiles - it allows an individual to quickly find other individuals they did not previously know with the same interest; it permits a variety of methods for publishing and exchanging images; as a digital medium it facilitates meticulous organisation and storing of images; and it even permits children to be contacted and enticed into an online or offline relationship.
- the Internet is publicly available, and as its popularity surged in the mid 1990's so many more ordinary members of the public became aware of child pornography for the first time. This sordid trade had moved from the relative obscurity of private exchanges of non-digital images and films, in person and through the postal service, to the instant transfer of material in a medium which anyone with a computer and a modem could access.
- specialist law enforcement units had tracked this change and were very concerned. Familiar with more conventional publishing methods and offline legislation on obscenity it is perhaps not surprising that they wanted the Internet industry to help stop the publication of this material by banning it.<sup>3</sup> The police in different countries were also struggling with the fact that much of the material was originating outside their jurisdiction, but widely available within it. The industry was initially uncertain as to how to respond, but was very concerned about facing prosecution for possessing or publishing material that in their view they should not be held liable for.
- The summer of 1996 in Europe saw a coincidence of the awful Dutroux case of child kidnapping and murder in Belgium (this case had no Internet component, but made everyone sensitive to child abuse); the high profile Stockholm Congress on Commercial Child Sexual Exploitation; and media hype about child pornography on the Internet<sup>4</sup>.
- Politicians around the world were under great pressure to respond. Attempts in the USA to frame new legislation - the Communications Decency Act - immediately provoked a legal challenge led by Free

Speech advocates but largely supported by the Internet Industry. While the CDA went far further than child pornography (already well covered by existing US legislation) to include indecent material, the impression was gained that using new legislation against "bad material" on the Internet was subject to flaws.<sup>5</sup>

- Experienced Internet users wanted to protect the free speech of their medium, and yet recognised that there was a danger that the small proportion of child pornography, about which the public was so concerned, could lead to draconian legislation. As citizens they did not like child pornography and wanted to respond.

The importance of these factors varied from country to country. Whatever way the factors combined, the general impact was to generate an urgent search for practical initiatives that might deal with the worst kinds of content on the Internet, and especially child pornography. Hotlines were seen as initiatives that could be instigated without legislation, that might provide an outlet for public complaints and an opportunity to devise procedures to deal with reports of illegal content.

Once the first hotline had been established, others quickly followed. I would suggest this quick uptake happened because:

- the Internet medium itself allowed much more rapid international communication of ideas than previously, and hotlines by their very nature, used the medium to promote their activities.

- the European Commission advocated hotlines as one component of a response to illegal and harmful content on the Internet<sup>6</sup>. By committing itself to encouraging a European Network of Hotlines, there was considerable interest in Member States in becoming involved.

- Governments outside Europe became interested in the hotlines approach through a series of international conferences<sup>7</sup>.

- hotlines could be implemented by a variety of different players thus broadening their appeal.

- the establishment of the Cybertipline in the USA by the highly respected National Center for Missing and

Exploited Children<sup>8</sup> in March 1998, building on their work in providing a 24 hour telephone reporting service, brought the most significant Internet using country into the hotlines arena.

The workshop will allow speakers from various hotlines to tell the stories of how they were established and what they do. Here I would like to try and analyse the overall functions of hotlines. This is perhaps easiest to understand in the form of a diagram showing the diversity of approaches possible under different headings

see diagram

Given the diversity represented in the diagram it may seem hard to draw any generic conclusions about how hotlines operate. However, the INHOPE Forum has attempted to do this as it has analysed what hotlines do, and in particular what the criteria might be for membership of the INHOPE Association. Members will be expected to:

- receive complaints from the public about alleged illegal content and use of the Internet
- have effective, transparent, procedures for dealing with complaints
- have the support of government, industry, law enforcement and Internet users in the countries of operation
- co-operate with other members in exchanging information about illegal content and use and share their expertise
- make a commitment to maintain confidentiality
- respect one another's procedures

These requirements are a mixture of what hotlines do and how they do it. Professor Herbert Burkert in his work for the Bertelsmann Foundation initiative on Self Regulation of the Internet<sup>9</sup> uses the interesting if slightly clumsy term "content concern systems" for hotlines. He very helpfully defines three fundamental requirements for the way hotlines should operate:

## Factor

## Possible Approaches

## Notes and examples

<b>Organisation and funding</b>	<b>Public Organisation:</b> <ul style="list-style-type: none"> <li>• Law enforcement agency</li> <li>• Other wholly publicly owned body</li> <li>• Publicly funded body</li> </ul>	<ul style="list-style-type: none"> <li>• Belgian Judicial Police run an e-mail hotline for Internet child pornography</li> <li>• Jugendschutz.net an agency set up by the German Länder responds to reports about illegal content</li> <li>• Cybertipline is publicly funded and run by a partly public/partly private body.</li> </ul>
	<b>Private industry:</b> <ul style="list-style-type: none"> <li>• run by Association</li> <li>• run independtly with industry funding</li> </ul>	<ul style="list-style-type: none"> <li>• AFA in France, FSM &amp; eco in Germany, ISPA in Austria, soon ISPA in Ireland</li> <li>• IWF in the UK is funded by the Internet industry but has non industry representatives on its board</li> </ul>
	Child Welfare organisation	Redd Barna in Norway and soon Radda Barnen in Sweden, Red Barnet in Denmark
	Other Private organisation	Meldpunt in Holland is a non profit "stiftung" with support from users, industry and Government
<b>Type of Illegal Material and/or Activity covered</b>	Child Pornography	All hotlines working with INHOPE are concerned about child pornography. Some especially in Germany are concerned about illegal racist or fascist material. The Cybertipline takes reports about all forms of child sexual exploitation online including enticement and sex tourism.
	Racist or extreme Political Material	
	Other	
<b>Media covered</b>	world wide web	Some hotlines eg IWF and Redd Barna cover all media . Some specialise in particluar media eg eco in Germany specialises in Newsgroups, FSM in web sites.
	newsgroups	
	Internet Relay Chat (and ICQ)	
	Other	
<b>Geographical Scope of Interest</b>	Only material hosted in home country	Some hotlines focus on material originating in their country and hosted their (eg FSM in Germany): others will consider material wherever it is hosted although actions may vary (eg IWF) It can get more complicated eg when material orginates from a national in one country, and is hosted on a server in another, with a domain name registered in a third!
	All material available in home country	
<b>Actions Taken on reports</b>	Advice given as to how to pursue complaint	A single hotline may employ one or more of these approaches. AFA in France is solely focussed on providing advice and awareness to users about how to pursue complaints.
	Original poster invited to remove content believed to be illegal	
	Industry advised to remove content believed to be illegal	
	Law Enforcement advised of content believed to be illegal	
	Illegal Content from outside country passed to another hotline or through law enforcement	
<b>Involvement in Awareness Activities</b>	Some promotion of hotlines activities alone	Most hotlines try and promote their activities through web sites and offline publicity. Some - notably Meldpunt and Cybertipline - have been involved in general Internet safety campaigns
	Promotion of hotline and more general educational activities aimed at users including children on how to use Internet safely.	

- availability - easy for users to find and report to.
- transparency - users should know who runs the hotline and how it deals with reports.
- reliability - users should have confidence that procedures will be followed accurately.

Hotlines have achieved some remarkable successes in the last three years:

- Many thousands of individual Internet users have reported, in their own language, illegal child pornography to an easily accessible and recognised agency.
- Thousands of child pornography images have been identified and removed from the Internet or from particular servers based in one or more countries.
- Law enforcement agencies have received vast quantities of intelligence about the presence of illegal child pornography on the Internet, often prioritised by the reporting hotline with additional identifying and tracing information provided.

Hotlines have undoubtedly made the Internet a better place. But it should be clear that their success relies on good relationships with others. They cannot catch paedophiles - that is the job of law enforcement. They cannot themselves block or remove illegal material from the Internet - if they tried it would cause mayhem, and in any case that is the proper function of ISPs under their terms of service agreements or the original poster of the material if he or she receives a warning. But they can harness the concerns of Internet users worldwide to protect their medium from material that shows the actual sexual abuse of children. They can identify that material and pass it to others for action.

## Hotlines working together

The introduction above comments on how the INHOPE Forum came together and the desire of hotlines to work together. As the work has developed the particular purposes of co-operation have been clarified. These are to:

- Exchange Experience - sharing technical expertise, procedural approaches and discussing policy issues
- Exchange reports - the possibility of hotlines passing on reports about material apparently hosted in another country to the hotline in that country. This depends on hotlines understanding the potential illegality of material in each others jurisdictions and having confidence in each others procedures.
- Support the development of new hotlines - through training and sharing expertise
- Inform and educate policy makers - especially in international fora, of which this conference is an example
- Promote awareness - the INHOPE web site can provide a one stop shop for links to hotlines in different countries

Of the above functions there is no doubt that exchanging reports is the most complex and difficult - although potentially there is much to gain from hotline to hotline exchange:

- it can be quicker than material being passed through more bureaucratic law enforcement channels from country to country;
- where there is good knowledge of procedures and good relationships in place, there can be confidence that particular action will be taken; and
- the amount of child pornography circulating on the Internet may be reduced (whether through ISPs in a country deciding to remove the material, a decision that can only be taken locally; or the originating poster being persuaded to remove it; or through police action)

Some have suggested that in the longer term hotlines might be able to share information about illegal material to the extent that they build together a database of illegal content that might be linked to software to filter out such content at the ISP or proxy server level. While this may be theoretically possible, experience to date suggests that exchanging reports is not as easy as it appears. There are some excellent bilateral relationships developing between pairs of

national hotlines but having a common database or even a "single clearing house" for hotline reports is unlikely to be realisable in the near future

It is clear that progress can only be made through the hard slog of regular meetings, seminars, publications, e-mail exchanges, telephone calls and so on. The INHOPE Association is committed to taking this work forward, and with the necessary funding, will I am sure play a significant role.

I would stress that while INHOPE is focussed on Europe, it is open to associate members or observers from outside Europe, and I would particularly like to commend the Cybertipline who have been enthusiastic members of the Forum to date, and attended the meetings entirely at their own expense. The new Association will be delighted to welcome participation from new hotlines wherever they are based.

## Future Challenges

In the few short years since the first hotline was established we have come a long way, but there are many challenges ahead of two particular kinds:

First, there is the evolving nature of paedophile activity on the Internet. The Internet does not stand still - new kinds of media become popular and easier to use. Law enforcement can enjoy successes against particular kinds of paedophile activity or in particular territories. Paedophiles respond to these factors and become more sophisticated in their operations. Some current trends that may become of increasing importance are:

- importance of IRC - newsgroups have historically been the part of the net where most child pornography could be found. In the last 12 months the exchange of child pornography in chat rooms has become much more prevalent. However in the USA the success of law enforcement agencies in some chat rooms has made paedophiles more wary. There has been little monitoring of chat outside the US. The Cybertipline has demonstrated it is possible for a 24 hour tipline service to be offered linking with law enforcement to provide an early warning of immediate dangers to children in chat but it is unlikely other hotlines would have the resource to justify a similar service

- child pornography web sites with a seeming commercial motive have emerged in the last few months. Commercial child pornography sold for money (as opposed to barter and exchange between paedophiles) had become much less common in traditional media by the 1980's. It may have reappeared because the net offers a much greater market, it is much easier for an individual to publish material, and there is increasing sophistication in technically making it difficult for law enforcement to trace. One recent example passed on by a European hotline to the US Cybertipline included so called teaser pages with explicit free child pornography, and a popular children's cartoon manipulated in the form of child pornography leading to a page where credit card details were required. The web site declared itself as Russian but appears to be hosted in the US.

- encryption - not surprisingly paedophiles are increasingly encrypting material. At one level this protects the innocent from seeing illegal material but it does pose major problems for law enforcement. Hotlines sit between the various interest groups and will need to decide whether they should act on reports of encrypted material, and if so how.

- hosting of sites in newer Internet markets - hotlines have reported recent growth of child pornography hosted in countries where the Internet is relatively new, some of which have weak law enforcement and Internet industry associations (if any). Examples are the former Soviet Republics<sup>10</sup>. There is a need to provide training for law enforcement in these areas and encourage the development of self-regulatory initiatives like hotlines.

Second there are the challenges arising from the complexities of organisational, social and cultural differences:

- Among hotlines themselves - unlike many other new international associations (whose members may differ in language and culture but are largely homogenous in organisational activity) hotlines are very heterogeneous, as is demonstrated in the table above. While good progress has been made to date, it would be unwise to underestimate the challenge of continuing and deepening co-operation among hotlines.

- Relationship with law enforcement - there is a challenge in a more general sense of how the role of hotlines can be complementary with the role of law enforcement, which I hope this conference will help clarify. There are some tensions which arise over the perceptions of technical expertise of hotlines v that of law enforcement; actions which hotlines might take that could have implications for investigations by law enforcement; limited feedback when hotlines provide leads for law enforcement; and the potential for hotline networks to parallel the Interpol networks. Let me make it plain that these are all challenges which I believe can be overcome, but only if there is continuing dialogue between national hotlines and law enforcement, and internationally between INHOPE and Interpol. Hotlines have no desire to become law enforcers, but they do want to play a role in helping deal with child pornography on the Internet.

- Legal Status - some have argued that voluntary organisations have no role in dealing with illegal material like child pornography<sup>11</sup>. Others suggest that hotlines can have a role if their legal status is clarified and they have a specific legislative basis for examining and storing child pornography (which would normally be a criminal offence). Many hotlines currently operate with an unclear legal basis but with the support of their national governments. For the sake of transparency and accountability there are merits in tackling the issues of legal status for existing and new hotlines, recognising that the position will vary from country to country.

- Maintaining standards - as voluntary organisations it is imperative that hotlines develop and maintain high standards. This is the particular value of Professor Burkert's work mentioned earlier<sup>12</sup> INHOPE requires individual hotlines to "have the support of government, industry, law enforcement and Internet users in the countries of operation " This condition is intended to avoid initiatives started by an isolated individual(s) with questionable motives from becoming members. Other issues that have already been discussed in INHOPE and will be explored further are the vetting and training of staff; providing counselling for staff; and developing procedure manuals.

## Conclusion

Although child pornography on the Internet may form a small proportion of Internet content it poses a huge challenge for society. Hotlines can provide a mechanism for receiving complaints from the public, collecting intelligence for law enforcement; removing illegal content from servers, and providing safety advice to Internet users. Co-operation among hotlines is essential and is the main role of INHOPE. There are many challenges to overcome for hotlines to be even more effective. A partnership among the Internet industry, law enforcement, child welfare groups, the Internet user community, and hotlines is necessary to adequately respond to the challenge of child pornography on the Internet.

## Footnotes

1 Even the word hotline does not have universal acceptance. In the USA "tipline" is preferred, and in many ways this is a more appropriate term

2 For links to this and other hotline websites see [www.inhope.org](http://www.inhope.org)

3 One example of action by law enforcement was a series of meetings in the UK between the Metropolitan Police and ISPs culminating in a letter identifying newsgroups carrying allegedly illegal material.

4 The respected Observer newspaper in London carried front page pictures of a director of a UK ISP with the caption "The school governor who sells access to photos of child rape" and of a Finnish Internet remailer with the caption "The Internet middleman who handles 90 percent of all child pornography,"

5 For a fascinating insight into the perspectives of US and UK legislators in July 1996 see the transcript of a video conference arranged by Childnet International <http://www.childnet-int.org/report/index.htm> After the successful challenge to the CDA the US Administration and the White House still saw illegal and harmful Internet content as a major priority leading to initiatives like the Internet Summit in December 1997 and the "zero tolerance" policy towards child pornography on the Internet

6 See [www.echo.lu/iap](http://www.echo.lu/iap) for details of the EC Action Plan for Safe Use of the Internet. There are extensive links on this site to a number of the documents and initiatives undertaken by the EC which led up to the Action Plan

7 For example, the Bonn Conference on Global Information Networks in July 1997 and the OECD Ottawa conference on Electronic Commerce in October 1998

8 See [www.missingkids.com/cybertip/](http://www.missingkids.com/cybertip/)

9 See [www.Stiftung.Bertelsmann.de/Internetcontent/](http://www.Stiftung.Bertelsmann.de/Internetcontent/) for details of this initiative and the Memorandum which includes comments about hotlines

10 However, as noted earlier appearances are deceptive and simply because a web site or other Internet content says it is from a particular country does not mean it actually is.

11 For example, the UK free speech organisation Cyber-Rights and Cyber-Liberties take this position see <http://www.cyber-rights.org/reports/>

12 See page 5 footnote 7.

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