

ISPAI Hotline.ie Service

ANNUAL REPORT

Let's Never Forget Behind Every Statistic is a Child Victim



COVERING JANUARY TO DECEMBER 2015



Contents

Foreword	1	How Hotline.ie Assesses Reports	13
Role & Remit of ISPAI Hotline.ie	2	Annual Comparison	14
ISP Self-regulation Framework	4	Monthly Comparison	15
Working with Industry	5	Reports Logged in 2015	16
Commitment to Transparency	6	CSAM Suspicion vs. Confirmed	17
Working with Law Enforcement	7	Evolution of CSAM Traced to Ireland	18
The ICCAM Project	8	The International Dimension of Online CSAM... ..	19
Working with INHOPE	9	Distribution of CSAM	20
Hotline.ie as part of the Irish SIC	10	Analysis 2015	21
Types of Illegal Content	11	Trends & Observations 2005-2015	28
Assessment Criteria	12	Challenges Ahead - National and Global	31
		Our Strategy	33



FOLLOW US ON TWITTER
[@HOTLINE_IE](https://twitter.com/HOTLINE_IE)



WWW.HOTLINE.IE



Scan the QR code
to link to the Hotline
Twitter Page

How to Make a Report:

Online Report Form @ www.hotline.ie

eMail: report@ hotline.ie



Co-financed by the European Union
Connecting Europe Facility



Foreword



I welcome the publication of the Hotline.ie Annual Report for 2015. I would like to congratulate the ISPAI and Mr. Paul Durrant and his team, for their work in operating Hotline.ie and in producing this report of their years' work.

Hotline.ie has been operating for 16 years now and over these years the Internet has become essential for many of us, as we use it daily in the home for entertainment, in our schools for learning, and in work for business. The Internet has many benefits. We need to encourage and promote the positive and safe use of the Internet especially by our children. However, we also need to provide a safe "online" and "offline" environment for our children and protect them from the illegal use of the Internet.

Hotline.ie dealt with the second largest number of reports received since it was founded. I note that this report also shows the international side to the operations of the Hotline.ie Service as it works in conjunction with 51 other Internet Hotlines in 46 countries worldwide and through INHOPE with Europol and INTERPOL.

Hotline.ie contributes to the empowerment of citizens by providing a means to report illegal material and in particular Child Sexual Abuse Content on the Internet and to have it dealt with appropriately in cooperation with the Gardaí.

In 2015 ISPAI Hotline.ie was awarded the INHOPE Quality Assurance Certificate for excellent service and standards after being assessed by an independent expert. I thank the ISPAI for their continuing operation of the Hotline.ie and wish them every success in their future work.

Frances Fitzgerald

Tánaiste and Minister for Justice and Equality



In 2015, Hotline.ie completed 16 full years of operation. Over this time usage of the Internet, particularly the Web, has permeated almost everyone's personal life and business.

In just 16 years, the ways in which the Internet is used have evolved at lightning speed. When Hotline.ie started Google was a "toddler". When we celebrated our 5th anniversary in November 2004, most people had never heard of a social network never mind having their own profile. They would have dismissed as clearly insane, anyone who predicted that in 2015 about 90% of the passengers on any bus or train, would have their faces buried in a wireless internet-connected device, checking out the latest trivia of their "friends" intimate lives and uploading theirs.

While undoubtedly 24/7 ubiquitous connection has brought immeasurable benefits, unfortunately as predicted at our inception, a minority will utilise the Internet's power for their nefarious activities. The Internet Industry doesn't want this traffic on our facilities and Hotline.ie is our first line of defence.

In this report, as well as a breakdown of reports made in 2015, we include an analysis of reported illegal content to show trends over the last 10 years - where the Internet has become significant within Irish society. I believe our findings give a unique insight into how misuse of the Internet by the criminal minority exchanging child sexual abuse imagery has evolved.

I would like to take the opportunity to add my personal thanks to our ISPAI Members for their support in 2015 and over the years. The Industry too has changed out of all recognition but has consistently supported the Hotline network to fight CSAM distribution online.

One essential closing remark, "Please do not ignore suspected illegal CSAM should you be unfortunate enough to encounter it, report it to Hotline.ie" and help Industry and Law Enforcement to make a difference.

Paul Durrant

Chief Executive of ISPAI and Hotline.ie Manager

Role & Remit of ISPAI Hotline.ie

The Role of ISPAI Hotline.ie

- ✓ Ensure that **Online CSAM is swiftly removed** from ISPAI Members' facilities by providing Member ISPs with **qualified Notice for Takedown** allowing them to preserve evidence for police investigation.
- ✓ Ensure **international reach and decisive action** against CSAM hosted, posted or provided outside the Irish jurisdiction by working in conjunction with 51 other Internet Hotlines worldwide which come together under the umbrella of the International Association of Internet Hotlines (INHOPE).

Our role is to provide an excellent and responsive national Hotline Reporting Service for the Internet, where the public may report suspected illegal content, such as Child Pornography also known as Child Sexual Abuse Material.

-
- ✓ **Work in conjunction with Law Enforcement Agencies**, where the source country does not have an Internet Hotline, to notify identified illegal content through police channels.
 - ✓ Work with relevant national and international stakeholders in order to **understand and identify solutions** that could be applied to address **emerging trends / challenges in CSAM production, distribution and proliferation over the Internet.**
 - ✓ Promote the ISAPI Hotline.ie Service and zero tolerance to CSAM. **Greater awareness could lead to more reports which in turn leads to more content being taken down.**

“

Our mission is clear and has stood the test of time. Despite rapid evolution of Internet technology it remains as valid today as when Hotline.ie was established [1999]. We aim to keep this relevance by continually honing our assessment expertise and adapting our systems to meet the new challenges.”

Paul Durrant, Chief Executive of ISPAI and Hotline.ie Manager

The Remit of ISPAI Hotline.ie

- Hotline.ie only deals with reports referring to suspected illegal content encountered on the Internet; urgent situations where persons may be in immediate danger should always be reported directly to An Garda Síochána.
- The Hotline will take action only if the reported online content is assessed by Hotline Analysts as illegal under Irish legislation [**Child Trafficking and Pornography Act, 1998 and Prohibition of Incitement to Hatred Act, 1989**].
- Hotline.ie primarily focuses on fighting Online Child Sexual Abuse Material or activities relating to the Sexual Exploitation of Children.



Child Pornography

- Child Pornography** – according to the provisions of the **Child Trafficking and Pornography Act, 1998** – a “child” means any person under the age of 17 years.
- any visual representation that shows a person who is or is depicted as being a child and who is (i) engaged in or is depicted as being engaged in explicit sexual activity,(ii) as witnessing any such activity by any person or persons, or (iii) whose dominant characteristic is the depiction, for a sexual purpose, of the genital or anal region of a child;
 - any visual or audio representation that advocates, encourages or counsels any sexual activity with children which is an offence under any enactment, or;
 - any visual representation or description of, or information relating to, a child that indicates or implies that the child is available to be used for the purpose of sexual exploitation.

What Constitutes an Offence Under Legislation

Under the Child Trafficking and Pornography Act, 1998 **it is illegal for anyone to knowingly possess Child Pornography. It is also illegal to knowingly distribute, print, publish, import, export, manufacture or distribute Child Pornography (including computer-generated or anime content).**

The Term 'CSAM'

To accurately reflect the gravity of the images and videos **ISPAI Hotline.ie uses the term Child Sexual Abuse Material (CSAM) instead of the legal term Child Pornography.** CSAM images and videos are documented evidence of a crime being committed – a child being sexually exploited and often actually raped.

ISP Self-regulation Framework

Self-regulation is usually defined as a regulatory process whereby an Industry-level organisation, such as a trade Association, as opposed to a Governmental body sets and enforces rules and standards relating to the conduct of companies in the Industry. In practice the ISP self-regulation model is a form of co-regulation because of state involvement, in this case the Department of Justice and Equality - Office for Internet Safety, which plays a key role in monitoring, overseeing, reviewing and ensuring that the wider self-regulatory system is performing.

In Ireland the self-regulatory system was the key recommendation of the Government's Working Group on the Illegal and Harmful Use of the Internet, in 1998.

Central to the Government's agreement in allowing a self-regulatory model to be adopted was the agreement of the Internet Service Providers Industry, represented by ISPAI, to commit to a number of specific actions, including; the establishment of an Internet Hotline Service where the public may

anonymously report suspected illegal content, particularly Online Child Sexual Abuse Material or activities relating to the sexual exploitation of children; the development of an Industry Code of Practice and Ethics setting out the duties and responsibilities of ISPs operating in Ireland and, common acceptable use policies.

The structure of self-regulation helps maintain focus on the core issue, combating Online CSAM, and avoids conflicts of interest by including

stakeholders with different interests and business models, while also facilitating a much needed multi-stakeholder approach.

For the past 16 years ISPAI, has been maintaining the ISP Industry's Code of Practice and Ethics and coordinating the self-regulatory regime (centred on an efficient Internet Hotline Service) which is recognised as a role model in the EU.

Working with Industry

ISPAI Members have zero tolerance to Online CSAM and they recognise that the only way to truly make a difference in tackling this heinous crime against children is through a multi-stakeholder approach and a global coordinated response where everyone from Law Enforcement, Industry and Civil Society has a role to play.

Each ISPAI Member is determined as ever to contribute to the global fight against the proliferation of illegal content on the Internet. Hotline.ie is acknowledged by ISPAI Members in Ireland, as having the expertise to be authoritative in determining whether content is illegal under Irish Law. When a Member receives notice from Hotline.ie, they will take the necessary steps to ensure removal at source, whenever possible, as this has proven to be the most efficient action in the ongoing fight against Online CSAM.

The 2000-31-EC “e-Commerce Directive” provides ISPs with the “mere conduit” exemption from liability for illegal content on their systems, providing that on gaining knowledge of its existence they act expeditiously to remove it. Hotline.ie plays a central role in this process, by providing a shared service to ISPs to fulfil the key requirements of the “Notice and Takedown” (NTD) procedure. These are: ISPAI Hotline.ie (1) provides a free and easy to access place where the public may anonymously submit

reports of suspected illegal content. (2) Has trained and internationally certified Content Analysts to verify if the content is probably illegal and trace the source ISP. (3) Issues qualified simultaneous notice to the ISP and Law Enforcement to initiate the “Notice and Takedown” procedure. This is especially important to allow ISPs deal swiftly with Online CSAM, legally referred to as Child Pornography.

Hotline.ie is covered by special agreement with Government and Garda to provide this essential service to the ISP Industry. If a Member ISP receives NTD from Hotline.ie, it will swiftly take appropriate measures, while preserving evidence for police investigations.

The Notice and Takedown Procedure is recognised worldwide as being a vital and efficient tool in removing CSAM at its source, reducing the availability of this content on the Internet, and disrupting the cycle of sexual exploitation and abuse of children and furthermore their re-victimization. Just think how it must feel for a child sexual abuse survivor to live knowing that their abuse has been recorded and that others may be watching it, sharing and re-sharing it; ISPs advocate removal at source as the single most effective way of breaking the cycle.

“

I am very proud that our Industry has supported Hotline.ie for more than a decade and a half. ISPs of all sizes have contributed to this successful model of Industry self-regulation; a model that, in co-operation with the Department of Justice and Equality, we look forward to continuing to support. ”

Paul Cunnane, ISPAI Chairperson and Chief Executive Officer, Westnet Ltd

Offsite backups are performed automatically to ensure essential Hotline Database and files are restorable in case of computer failure. These backups are encrypted and zipped before transmissions to the offsite backup location.

We are confident that our data is robust and reliable; our system allows us to go all the way back to the 1st report ever processed ('99) and pull the assessment details recorded backing-up each determination. Note: Hotline.ie only stores the content assessment, thus there is no CSAM database held by ISPAI Hotline.ie

Our Hotline process and staff support mechanisms were inspected in September by the Office for Internet Safety.

Commitment to Transparency

The ISPAI Board of Directors receives a monthly report while quarterly updates on Hotline.ie's operations are presented to the Internet Safety Advisory Committee.

In 2015 ISPAI Hotline.ie was awarded the INHOPE Quality Assurance Certificate for excellent service and standards after being assessed by an independent expert.

The Hotline Operations Procedure Manual is agreed and endorsed by An Garda Síochána, while the overall activities are overseen by the Department of Justice - Office for Internet Safety.

When contact details are provided by a reporter, the data is anonymised within 90 days from the report's close date.

Working with Law Enforcement

An Garda Síochána

- Since its inception (1999) Hotline.ie has been run by ISPAI, overseen by the Department of Justice and Equality and has been working in conjunction with Law Enforcement.
- An Garda Síochána has a specialised unit, the Paedophile Investigation Unit of the Garda National Protective Services Bureau, for dealing with child abuse and offenders. There is also a Cyber-crime Unit and computer forensic expertise within the Garda Bureau of Fraud Investigation. But An Garda Síochána do not have a specific police hotline for reporting illegal content on the Internet, thus the Gardaí support that members of the public should report suspected Internet content to Hotline.ie.
- With the advent of online technologies and in a fast paced environment where everything is shifting online, Hotline.ie acts like a liaison between Internet Users (members of the public) – Industry – Law Enforcement and by its affiliation to the INHOPE networks adds an international dimension, which is crucial given the global nature of the Internet.
- Our analysts, while assessing content that it is found to be illegal will note any features in CSAM which might help Law Enforcement Agencies (LEAs) identify the location and ultimately the child victim and/or the perpetrator.
- The collaborative work of ISPAI Hotline.ie and particularly of An Garda Síochána and international LEAs such as Interpol and Europol focuses on child victim identification so they may be rescued from abuse and the perpetrator identified and brought to justice. This remains a difficult and complex process, due to the global nature of the Internet, and requires international cooperation.



“The primary focus of Hotline.ie is to combat the distribution of Child Pornography on the Internet. Other content and activities on the Internet may be reported using this service but are not necessarily reported to An Garda Síochána.

The source of any material that is assessed by Hotline analysts as constituting Child Pornography (as defined by the Child Trafficking & Pornography Act of 1998) is reported directly to the Paedophile Investigation Unit of the Garda National Protective Services Bureau.

These notifications form the basis of criminal investigations and intelligence gathering within this jurisdiction and internationally via INTERPOL.

There is ongoing and valuable co-operation between Hotline and the Garda National Protective Services Bureau in relation to these notifications. The co-operation which exists between INHOPE and various Law Enforcement Agencies worldwide (including Europol and Interpol) is significant in terms combating Child Sexual Abuse Material online.”

Declan Daly

Detective Superintendent
Garda National Protective
Services Bureau

The ICCAM Project

Internet Hotlines working in Conjunction with Europol and INTERPOL

The online distribution of CSAM is a global issue as quite often the child victim may be sexually abused in one country, the images of the abuse uploaded to the Internet in a different jurisdiction, hosted on servers in yet another and the content accessible anywhere in the world.

This is why only continuous and cross-jurisdiction decisive action may disrupt these criminal activities. To ensure swift action and international reach Hotline.ie works in conjunction with 51 other Internet Hotlines in 46 countries worldwide and through INHOPE with Europol and INTERPOL.

In 2014, ISPAI took the next step, to further improve, enhance and maximise the work of Hotline.ie by volunteering, alongside 11 other Hotlines, to be part of the EC funded BIK-NET ICCAM Pilot Project, coordinated by INHOPE in partnership with INTERPOL.

ICCAM is a software solution developed to enhance and improve the collection of data in connection to identified CSAM images and videos – with the purpose of assisting LEAs with quality leads and technical details necessary for police investigations. It is revolutionary in terms of adding value to the image/video analysis already undertaken by Hotlines though the use of “hash(es)” – a unique code that is generated from the data in the image, like a digital fingerprint.

Although still in BETA testing, throughout 2015, ICCAM is a game changer in the fight against Online CSAM as each image assessed by a Hotline Analyst as CSAM is classified and “hashed” within the ICCAM solution and then made available directly to INTERPOL.

Subsequently to INTERPOL’s validation the data is added to INTERPOL’s Child Exploitation Database (ICSE) – which (by the end of 2015) included data on more than 8,000 identified victims from nearly 50 countries, as well as data related to numerous unidentified victims, whose cases are still under investigation.

This development is particularly important with the increased use of TOR making content tracing almost impossible, as it will ensure that the images are being captured and available to LEAs. Those images, that otherwise would have been lost, may contain the missing clue which in turn could be the key to breaking-down or even solving a case.

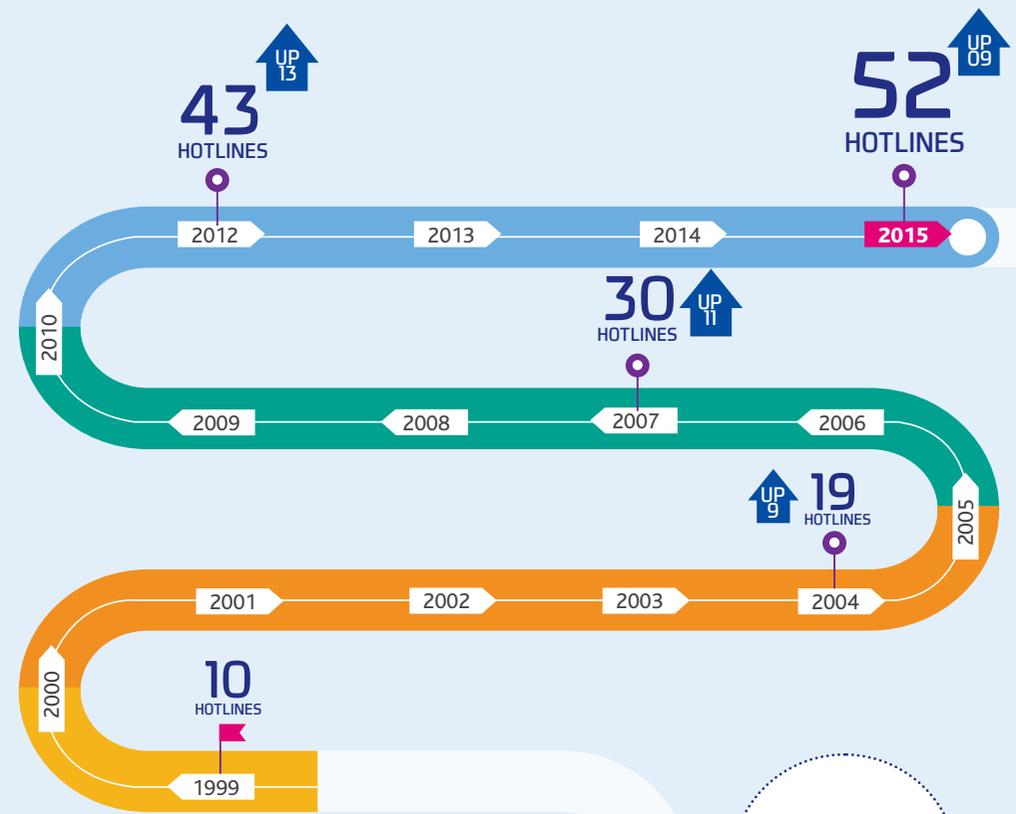
When the production version of ICCAM becomes available new procedures for its incorporation into the daily workflow of Hotline.ie must be developed. Following their assessment and approval by the Office for Internet Safety and An Garda Síochána, ISPAI Hotline.ie will, in addition to being able to compile statistics about reports, also have the ability to count items. That is, have statistics relating to content observed on an image and video basis. This feature is particularly relevant as it will facilitate better national and global understanding of the scale of online CSAM distribution, by enabling accurate analysis of “known” (content already seen) and “new” CSAM.

Working with INHOPE

To ensure international reach ISPAI Hotline.ie works in conjunction with 51 other Internet Hotlines as part of the INHOPE network:

- Illegal activity on the Internet is a cross-border problem that no organisation can effectively tackle alone. For the most part, illegal material reported to Internet Hotlines is hosted outside the reach of their own jurisdiction.
- INHOPE was established to support Internet Hotlines around the world in dealing with Online CSAM and to provide the means for Hotlines to pass/exchange the relevant information, without delay, to a trusted counterpart Hotline in the "source" country (where the CSAM is actually hosted) so that swift action could be taken to remove the content from the public Internet while preserving evidence for police investigation.
- INHOPE is the organisation that is responsible for building and expanding this network of trust so instrumental in the fight against CSAM.
- ISPAI is one of the founding members of INHOPE which has grown to a network of 52 Internet Hotlines in 47 countries worldwide.

INHOPE Network Expansion 1999-2015



52 Internet Hotlines in 47 countries worldwide

Hotline.ie as part of the Irish SIC

Working as part of the Irish Safer Internet Centre (SIC)

The Irish SIC is a consortium of Industry, Education, Child Welfare and Government partners that provide awareness (webwise.ie), hotline (hotline.ie) and helpline (childline.ie and npc.ie) functions and activities in Ireland and it is coordinated by the Department of Justice and Equality – Office for Internet Safety.

Today's Irish SIC, a well-established organic national hub, is the result of constant effort and development made possible through continual EC funding via the Safer Internet Programmes and, since 2015, the Connecting Europe Facility.

The increasingly fast development of Internet enabled devices has brought the Internet to the fingertips of almost every citizen. It has changed completely the perception and boundaries of “offline” and “online” worlds. Furthermore, these technological developments and high speed Internet access led to an unforeseeable amount of content being created, distributed and shared online – across jurisdictions – every single minute, contributing to a shift in rationale, marked by an increased desire, especially among young people, to be “connected” at all times. Today's Internet User is more connected than ever before through the widespread availability of affordable digital devices and almost ubiquitous wired, Wi-Fi or mobile data coverage.

ISPAI believes that prevention is as important as reaction in the fight against online CSAM and the exploitation of children online. The problems are evolving rapidly. For example, it was always assumed that children featured in CSAM were the victims of adult predatory behaviour. However, increasingly Hotline.ie Content Analysts in processing reports see what is assessed as self-generated content. That is children are taking photos and making videos of themselves using tablets and smart phones. Typically, this involves adolescents estimated to be between the ages of 13 and 16 years old who are discovering and exploring their sexuality with friends, as persons of this age have always done. However, they have been born into this Internet connected world and some too easily share and lose control of this content.

Mostly this content is not illegal but sensitive and for various reasons sometimes their images are used for revenge, bullying and even blackmail. These images have also turned up on adult forums and websites hosted in disparate countries. To compound the problem, unfortunately, sometimes their self-generated content does constitute CSAM.

These issues must be tackled by education and Hotline.ie very much supports that balanced, authoritative guidance and teaching materials for schools and parents is available. This is the work of the Awareness Node in Ireland (Webwise) and NPC who provide

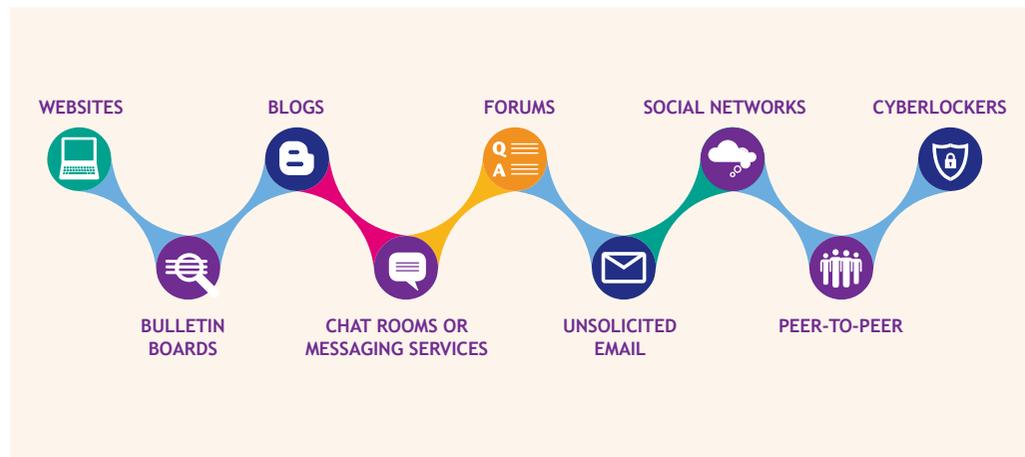
talks for school parent associations. When parents and children have concerns it is important that there are helpline resources such as the ISPC-run “Childline” and the NPC support line for parents where trained personnel can offer advice and guidance to those affected.

The Irish SIC believes strongly that it is crucially important to adapt and help protect the vulnerable by providing citizens with the know-how and tools to stay safe online, as well as reporting and support mechanisms (hotline and helpline) so that appropriate actions may be taken when things go wrong.

The Irish SIC is the embodiment of Ireland's commitment to empowering its citizens, particularly children and youth, to use the Internet, and available technologies in a positive, safe and efficient manner, reducing the levels of suspicion and anxiety in relation to the use of the Internet, by facilitating access to information, advice, tools and reporting mechanisms for harmful and illegal content.

Types of Illegal Content that Should be Reported to Hotline.ie

These types of Illegal Content may be accidentally encountered anywhere on the Internet and should be reported to Hotline.ie irrespective of the service for example:



Child Sexual Abuse Material	Child Trafficking
Child Grooming Activities	Incitement to Hatred
Child Sex Tourism	Financial Scams



How to make a Report

We recommend the use of the web forms provided on www.hotline.ie in reporting suspected illegal content encountered on the Internet be it anonymously or non-anonymously (as preferred by the reporter). The web forms are accessible by clicking the large “Make a Report” button prominently positioned on the top right of every page. Hotline.ie prefers to receive reports via this channel as the online forms are designed to request relevant technical details based on suspicion, type of service [where the content was encountered], URL (link) to the content, etc., crucial in the Assessment Process. Moreover, the forms have integrated help boxes that will guide the reporter through each step. However, reports are also received via e-mail and automated answering machine.

Assessment Criteria

- Trained and internationally certified Content Analysts assess each report submitted to Hotline.ie, using best practices and guidelines agreed in conjunction with the Department of Justice and Equality, the Internet Service Providers, Law Enforcement Agencies and the INHOPE Association.

When assessing whether or not content reported to Hotline.ie is likely to be illegal under Irish Legislation, Content Analysts rely on the Child Trafficking and Pornography Act, 1998 and Prohibition of Incitement to Hatred Act, 1989.

- Only a Court of Law can make a judgement as to whether something is definitively illegal under the law.

- However, under the transposition of the EU Directive on Electronic Commerce, ISPs must take action within a reasonable time where identified illegal content is brought to their attention. When Hotline.ie assesses content to be

probably illegal, it is simultaneously notified to An Garda Síochána, who may then choose to initiate a criminal investigation and to the appropriate ISPAI Member for removal from public access.

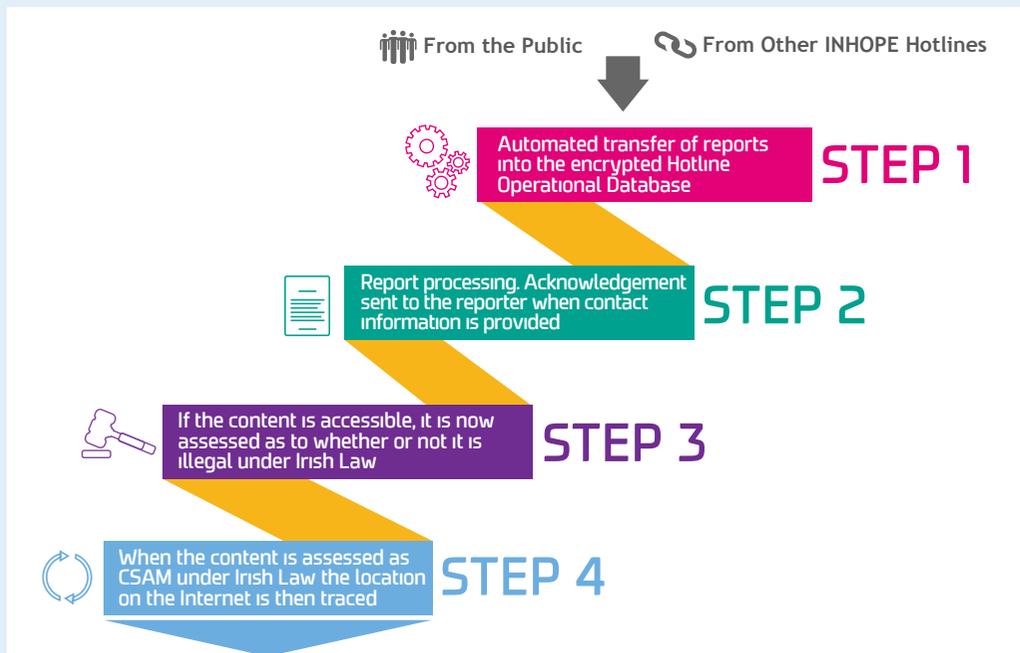
- If the content “in itself” is not contrary to law, it is assessed as not illegal and Hotline.ie will not take any further action.

Why Cases of Child Erotica and Child Nudity are Classified as NOT Illegal:

By Child Erotica Hotline.ie refers to: images of children posed in an explicitly sexual manner but are not illegal as they do not meet the criteria set in Law. If they were found to be hosted in Ireland on an ISPAI member’s facilities, though to-date this has never happened, Hotline.ie would notify the ISP to consider removing the content under the ISPAI Code of Practice and Ethics.

By Child Nudity Hotline.ie refers to: images where children may be naked but the photo or video was not produced for pornographic purposes. Examples include pictures of naked children in famine or war zone situations, naturist sites where pictures are taken in family contexts, or images taken for diagnostic reasons which are presented in a medical context.

How Hotline.ie Assesses Reports



If the Child Sexual Abuse Content is Traced to Ireland:

- The Internet Service Provider is identified;
- Hotline.ie issues a Notice to An Garda Síochána as the decision to initiate a criminal investigation is a matter for Law Enforcement alone;
- A Takedown Notice is issued to the ISP in question, which is then responsible for the removal of the specified content from their systems while preserving the forensic evidence for the police investigation.

If the Child Sexual Abuse Content is Traced to Outside the Irish Jurisdiction:

- If an Internet Hotline exists in the country of origin, then all technical details, including Hotline.ie's determination, are forwarded to the Hotline for processing.
- If the content is located in a country with no Internet Hotline, then Hotline.ie will send the content description and tracing details to the source country through international Law Enforcement channels.

Reports vs URLs

The use of “URLs” refers to content on the open web (accessible by anyone from anywhere in the world), as opposed to other types of Online services such as P2P.

Hotline.ie uses the term “reports” to describe notifications received from public sources through our reporting tool www.hotline.ie or a counterpart Internet Hotline via the INHOPE network.

A report is a “single reference” about suspect content on the Internet. For example, in its most simple form, a report is where a member of the public notifies Hotline.ie of the existence of a URL that they might have accidentally encountered while using the Internet and they believe may contain illegal content.

This URL may, in fact, contain multiple legal or/and illegal images or/and videos, text, virtual content (anime) etc. and links to other pages or sites. It doesn't matter what type of content or how many items the URL may prove to contain on investigation – this is recorded as 1 report in the Hotline Operational Database.

However, if a reporter, submits a number of separate references (separate URLs--be it completely distinct websites or sub-directories of the one site), within a single communication to the Hotline; because they have taken the trouble to isolate them, each will be treated as a separate report.

Annual Comparison

Volumes of Reports

In the 12 month period from 1st January to 31st December 2015, ISPAI Hotline.ie received and processed 3,153 reports, which marks a decrease of 35% from the previous year (2014); nevertheless it is the second highest year to date.

When looking at volumes per year, we do have to bear in mind that in 2014 Hotline.ie received an unprecedented number of reports (4,863) making it by far the highest year in the history of the Hotline.

However, in 2015 Hotline.ie has witnessed a rise in reports of 46% over the average per year (including the 2014 peak). Moreover, Hotline.ie determined that 13.5% of all fully assessed reports (2,582) were illegal under Irish Law as opposed to 9% in 2014 (3,982 fully assessed reports).

Public Reports vs. Proactive vs. Derived Reports

By “Public Reports” we mean notices of suspected illegal content received, by ISPAI Hotline.ie, mainly from members of the public and/or counterparts (Internet Hotlines); while “proactive” means to actively seek out illegal content on the Internet.

ISPAI Hotline.ie relies 100% on public reports, as it is not mandated by

Number of Reports Received per Each Year (2000-2015)



Government to engage in proactive search. Therefore, we urge the public to alert Hotline.ie to any content they suspect could be illegal which they might stumble across while using the Internet. Otherwise, neither Industry nor Law Enforcement would know about it and would not be in a position to expeditiously take action against it.

Occasionally, when assessing content referred to in a public report, Content Analysts find that the reported source provides/promotes links or other obvious references suggesting further illegal content at a different location. In such

cases, the Hotline Analysts will follow the links / instructions in question and examine the content presented. If it is found to be illegal under Irish Law the Analyst will create a new report for each separate location found and these will be acted on using the same procedures as for public reports. We refer to these instances as “Derived Reports”.

As the “derived” content is discovered in the course of processing a Public Report it is not proactive searching and is in line with Hotline.ie mandate agreed with Department of Justice and An Garda Síochána.

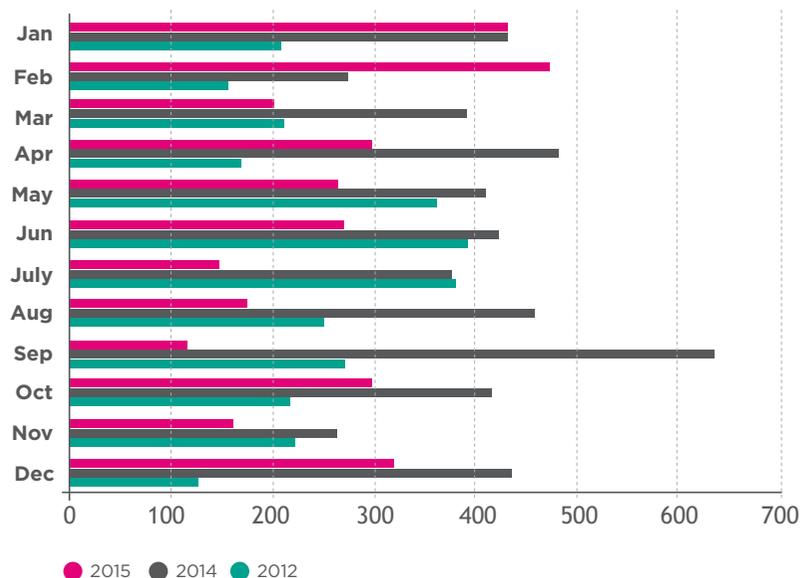
Monthly Comparison

The graphic opposite shows the distribution of reports received by Hotline.ie, per month, taking the three highest years - in terms of volume - in the history of the Hotline.

The record of 635 reports received and processed in a single month set in September 2014 still stands. In that month alone 37% more reports were processed than in the whole year 2001 (465).

In 2015, the highest month was February with 474 reports, amounting to 2% more than all reports received over the whole of 2001.

Monthly Distribution of Reports Received



2015 Source of Reports Breakdown

SOURCES



Public Reports



Derived from Public Reports



Internet Hotlines

CHANNELS

36 + 170 + 21 + 15 + 1 + 2910

Derived Reports

Email

Internet Hotlines

Telephone Answering Machines

Post

Online Form via www.hotline.ie

=

TOTAL REPORTS
3153

Reports Logged in 2015

Of 3,153 Reports Logged in 2015, 571 did not Undergo the full Assessment Process



Breakdown of all Fully Assessed Reports (2,582)



CSAM Suspicion vs. Confirmed

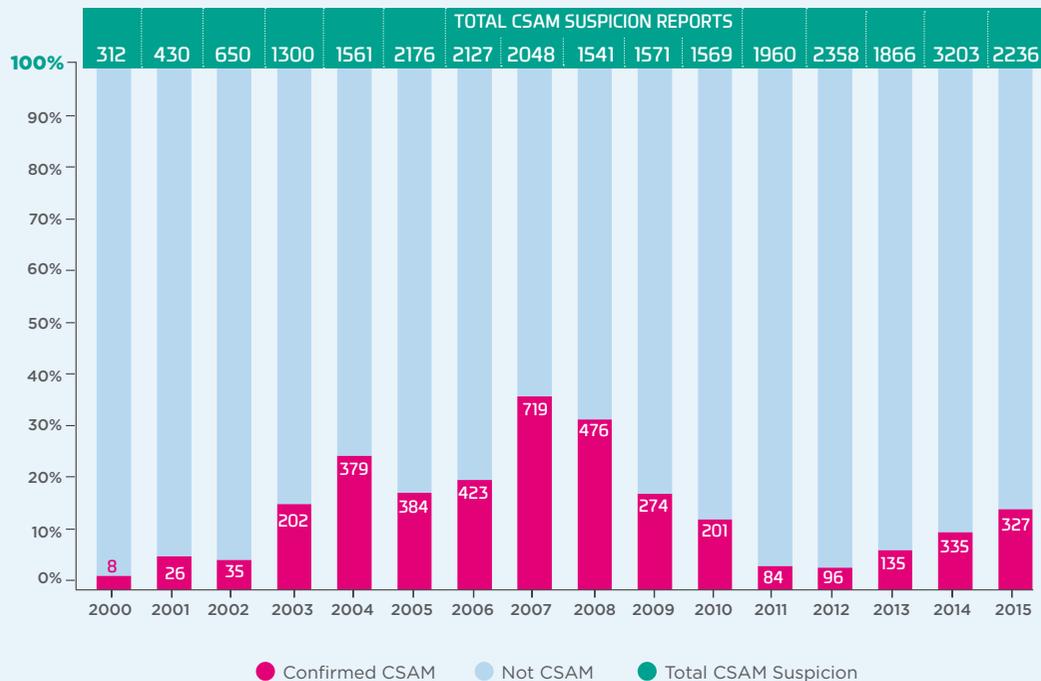
When a person submits a report to Hotline.ie there is usually a specific reason given or implied - suspicion. Where the Hotline.ie's web forms are being used, it is mandatory to select from the drop down menu the type of suspected illegal content being reported. If no suspicion is given or the Content Analyst cannot decisively deduce the reporter's reason, the "suspicion" is set to "other".

Note, the suspicion recorded is taken purely from the words used by the reporter and is recorded in advance of any attempt by the Content Analyst to access and assess the content.

Thus, the use of the terms "suspicion" and "confirmed" or "determined", the latter two being attributed to a report after the assessment process is completed.

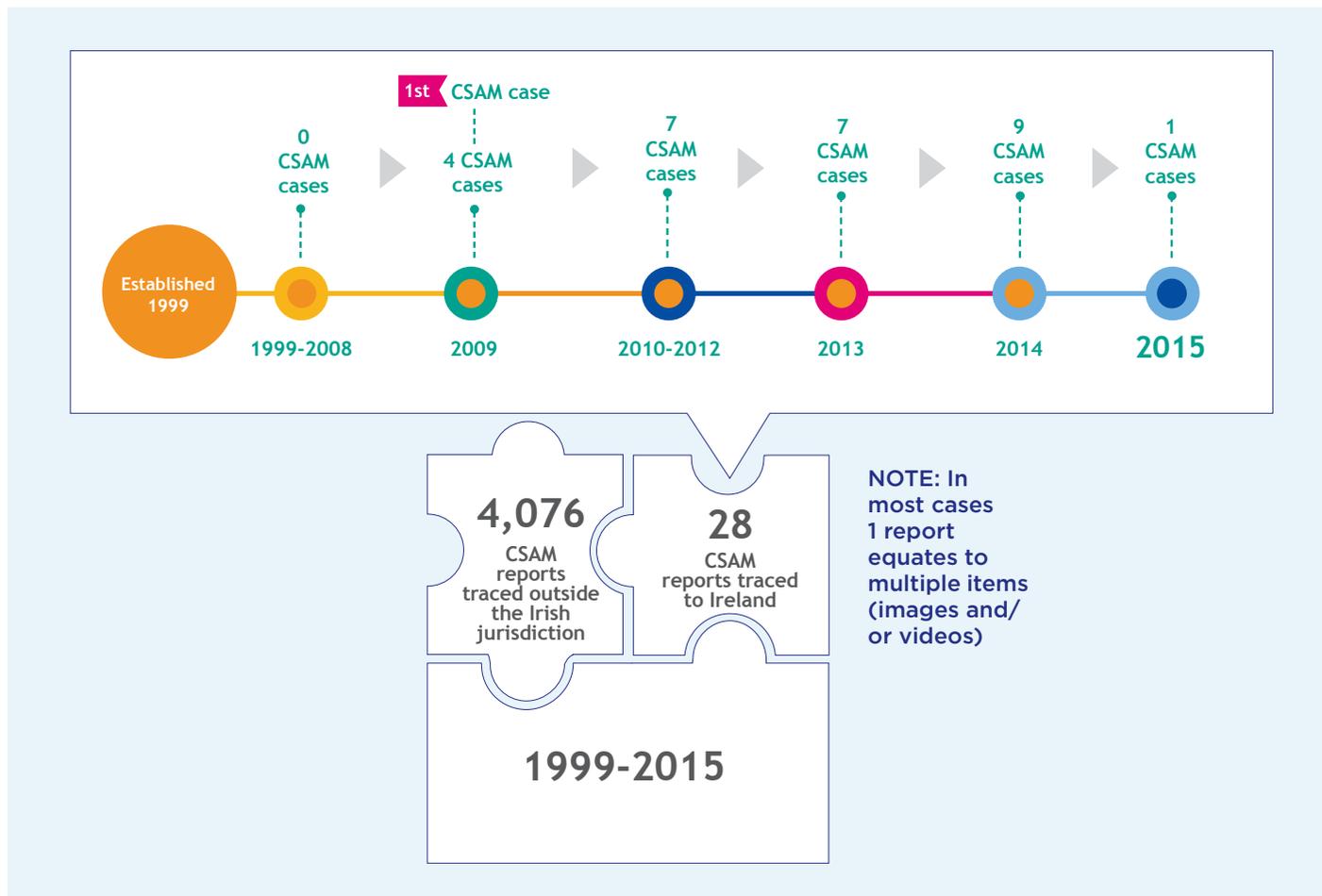
In 2015, despite a 35% decrease in overall reporting when compared to 2014, both the proportion of suspected CSAM to all reports and, the proportion of confirmed CSAM to suspected CSAM reported, was higher by 5% and 4% respectively.

Chart Mapping Confirmed CSAM as a Percentage of CSAM Suspicion Reported In Each Year



Evolution of CSAM Traced to Ireland

CSAM instances Traced, by Content Analysts, to Ireland



The International Dimension of Online CSAM

The scale (volume) of Online CSAM is subject to much speculation. Although significant progress is being made with the development of ICCAM (still in BETA testing throughout 2015) - to date, there is no way to accurately project the global scale of CSAM available and distributed Online, as in order to do so we should know how much is “known” CSAM (content already seen by Analysts) and how much is “new” content. And even so, Hotlines around the world can only see what it is being reported to them! That it is why, uninterrupted Hotline Service, greater awareness and continuous network expansion is crucial to the success of our collective mission - to stamp out Online Child Sexual Abuse Material.

In an increasingly interconnected world crime has no borders, what happens “abroad” might be of importance “here”. In the era of the Internet and 24/7 connectivity “abroad” and “here” become intertwined and interchangeable, hence in order to detect and disrupt criminal activity before it sets roots in our community we must work in conjunction with international partners (Hotlines, Law Enforcement Agencies, Governments, Industry, etc.).

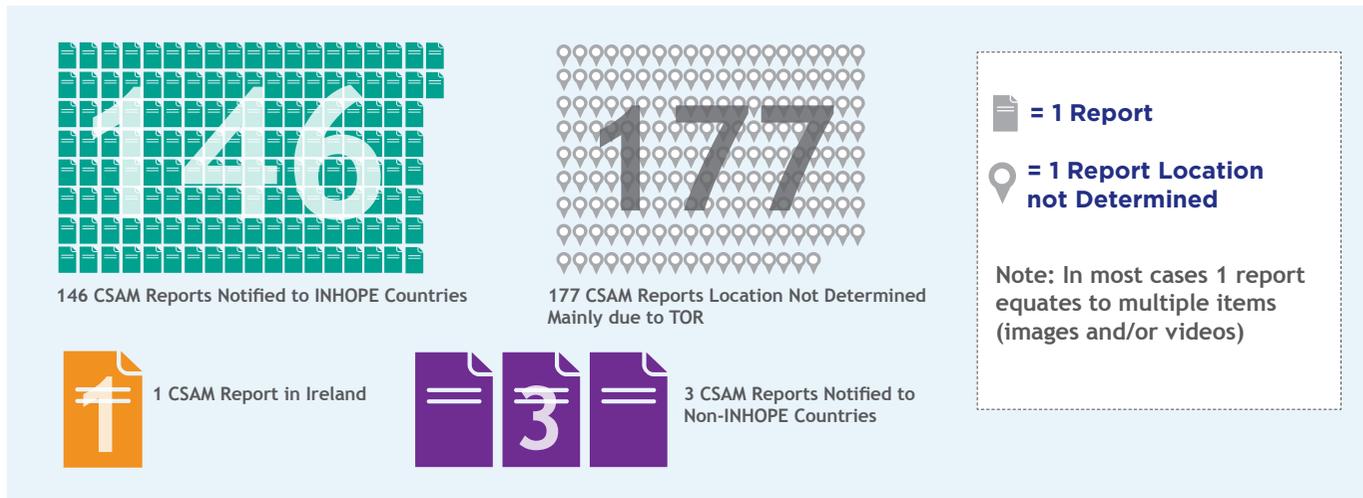
In the physical world we are divided by national borders and jurisdictions but Online we are one big multi-cultural community and we must learn that it is up to every single one of us playing his/her part to turn the Online environment into the safe and positive environment that we want. Even the “smallest” detail can prove to be actionable intelligence to LEA, and through reporting suspected illegal content, every one of us can make a difference. To help put things into perspective, let’s stop for a second and consider the possible global implications of one simple action – making a report - for example, one report to the Irish Hotline might lead to the missing piece necessary to LEA in the USA, which in turn could result in the identification of a child victim and the apprehension of the abuser in the Netherlands. This is actually the case more often than one might think.

Some examples, over the years, where that 1 report to Hotline.ie (the starting point) had huge impact overseas: Ireland and Australia putting down a network of CSAM websites (2008); 1 report assessed by Hotline.ie in 2008 led to the apprehension and conviction of a suspect 2 years later in the USA; the arrest of 2 suspects in Spain (2010); the arrest of a 34 year old teacher in Bulgaria (2011), 1 report which led to 928 unique cyberlockers each containing sets of CSAM traced to Taiwan (2013), etc. These examples are not just specific to the Irish Hotline, they are actually seen all over the network - the latest one, for example, involving cooperation between the UK, USA and Australia (March 2016).

Apart from the special success stories mentioned above, we believe that success is achieved every time CSAM is identified and removed swiftly from the Internet despite being located in a different jurisdiction.

Distribution of CSAM As traced by ISPAI Hotline.ie in 2015

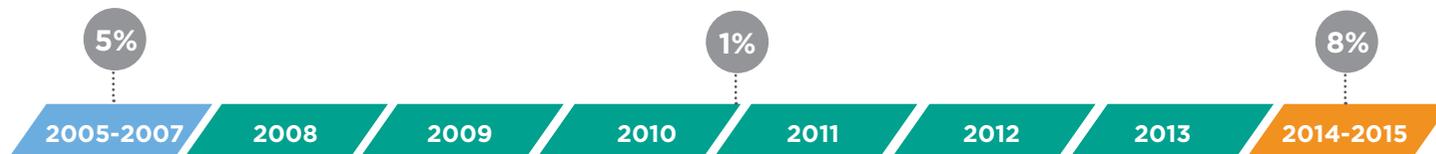
CSAM Reports Distribution as Traced by ISPAI Hotline.ie in 2015



Over the past 10 years only 14% of all confirmed CSAM were recorded as location not determined, with the two ends of the period having the highest incidents, mainly due to spam (2007-2005) and TOR (2015-2014) See timeline below.

However, with the increase usage of TOR we are concerned that the number of “location not determined” will continue

to grow. As it can be seen this year, 177 confirmed CSAM reports where the location proved to be untraceable is not an insignificant number, and shows the importance of developing the ICCAM system so at least the images could be captured and subsequently input into INTERPOL’s database to assist investigations and victim identification.



Analysis 2015

Of Reports Determined by ISPAI Hotline.ie as Illegal Under Irish Law

348 reports were determined by Content Analysts as illegal under Irish Law, representing 13.5% of all fully assessed reports.



Financial Scams

The number of reports, submitted to Hotline.ie, quoting financial scam as suspicion remains low (88) despite the level of phishing and other eMail scams that prevail on the Internet. However, only 22% of the reported content was determined by Content Analysts as financial scams. 56% of these reports were related to phishing activities purporting to be: Revenue (Tax Refund Fraud), Electric Ireland, Bank of Ireland, Apple Support, Microsoft Tech Support, donedeal.ie (cars for sale) and TotalJobs.com; while 21% related to online transactions, where the reporter claimed goods were purchased but never delivered. Hotline.ie cannot pursue such transaction issues and refers reporters to the Gardaí. The remaining 26% were too scattered to point towards a pattern or lead to any significant observations.



Phishing

a fraudulent practice via eMail, IM, Text or other communication channels with the aim to scam the user into giving out login credentials, account information, personal information such as passwords, credit card numbers, etc. by purporting to be a legitimate service or company, State Agency, Financial Institution, Internet Service Provider, Health Provider, etc.

Example Tax Refund Fraud - Revenue

Payment Confirmation for Tax Refund Request # 39017833

Revenue - Irish Tax & Customs
<noreply@revenue.ie>

Dear Customer,

After the last annual calculations of your fiscal activity, we determined that you are eligible to receive a tax refund of 277.26 EURO. Please submit the tax refund request and allow us 10-14 days in order to process it. To access your tax refund, please follow the steps below:

- Download the Tax Refund attached to this email
- Open it in a browser
- Follow the instructions on your screen

NOTE: A refund can be delayed a variety of reasons, for example submitting invalid records or applying after deadline.

Child Sex Tourism

The first case of Child Sex Tourism (CST) in the history of Hotline.ie was in 2007.

"Want to have sex with 12-14 year old child? It's very hot"

Was the text of the spam eMail advertising CST, along with instructions on how to contact the facilitator. The Content Analysts traced the spam to an IP address in Germany and immediately informed LEAs so that appropriate action could be taken.

Up to 2015 there were no other reports determined by Content Analysts as CST. The 2 instances determined as CST in 2015 were linked to a website on TOR purporting to sell escort services of clearly underage girls, according to the sample pages. This activity is illegal under the Irish Child Trafficking and Pornography Act, 1998 – Section 3.

Because the website was a TOR resource, the Content Analyst was not able to pinpoint the country of origin of the website. However these 2 instances were notified to Law Enforcement with all relevant technical details available.



Child Sex Tourism

is a type of Commercial Sexual Exploitation of Children. The United Nations defines Child Sex Tourism as "tourism organized with the primary purpose of facilitating the effecting of a commercial-sexual relationship with a child

TOR

Short for The Onion Router aka "The Anonymity Network" is a software programme that intercepts the network traffic, shuffles it through a number of randomly-chosen computers before passing it on to its destination – basically providing hidden services – making location tracing almost impossible.

Child Pornography aka Child Sexual Abuse Material (CSAM)

15% of all reports quoting this suspicion, in 2015, were determined by Content Analysts as CSAM under the Child Trafficking and Pornography Act, 1998. The average of confirmed CSAM out of all suspected CSAM reports, for the past 15 years, is 15%.

Historically speaking, the highest number of CSAM reports confirmed by Content Analysts in a year (35% of all suspicion) was recorded in 2007.

At that time CSAM was being advertised through eMail spam (basically CSAM in your inbox), index sites, shared via bulletin boards, forums, chatrooms, cyberlockers, P2P and other means. In 2007, often one resource would link to tens of other affiliate CSAM websites. For example 2 in 5 CSAM reports would reference resources which in turn would link, on average, to 32 other CSAM sources [the original source would act like a CSAM gateway/portal].

Regrettably, there was also a prominent commercial aspect to CSAM – meaning websites hosting or giving access to CSAM on a membership basis which required some sort of payment.

1 in 5 reports (2007) had layers of payment mechanisms, content stores, membership systems and advertising frames. Over the years, Content Analysts have seen many payment methods that would range from pre-pay cards, credit systems, “virtual money”, SMS Payments etc.

The Hotline Analysts have also witnessed legitimate and innocent websites being hacked, with the purpose of facilitating the distribution (or even sale) of CSAM, for example redirector advertising pages; image and video stores; comment section; etc. The owner of a hacked website and the hosting company are likely to be unaware of the presence of such content.

In recent years Hotline.ie has recorded very few cases of Commercial CSAM but as outlined by the European Financial Coalition in their latest report “meeting environments such as Bulletin Board Systems, social media and closed forums still facilitate direct communication and distribution of CSAM links” (“Commercial Sexual Exploitation of Children Online – A Strategic Assessment”).

CSAM

We prefer to use the term Child Sexual Abuse Material (CSAM) instead of the legal term Child Pornography, as we believe it reflects more accurately the gravity of the images and videos – which stand as documented evidence of a crime being committed – a child being sexually exploited and often actually raped.

Excerpt From a 2007 Report - SPAM Advertising Commercial CSAM

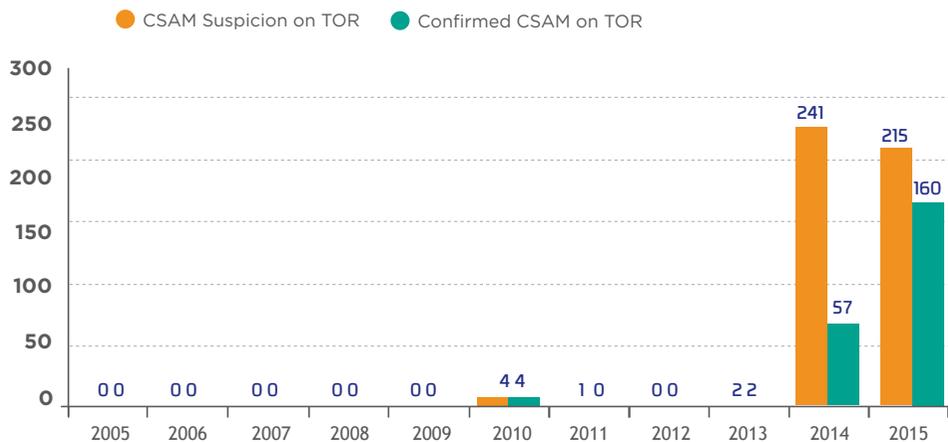
Tired of old-of-date photos?
Introducing new site of the 2007 year. We are back and worked hard to bring you real new quality in this niche. 10,000 exclusive photos of most beautiful and youngest girls will not give you a break. Now... Only New. Only Best. Don't waste your time to read more. Just take a look">>> preview site <<< + promotion of other 45 CSAM paysites" – access to images on membership basis



Scan the QR Code for:
“Commercial Sexual Exploitation of Children Online – A Strategic Assessment” – published by EFC

Established CSAM “brands” known to Hotlines no longer retain all aspects of the purchase process thus making the commercial nature less explicit at various points in the online journey than before. There is also an apparent migration from traditional channels (on the open web) and payment systems to “underground markets”, fully peer-to-peer “markets” fostered by the anonymity conferred via TOR and the emergence of various crypto-currencies (“anoncoin”). The Irish Hotline can corroborate this migration based on the high number of suspicion and confirmed CSAM received in the past 2 years pointing to TOR. Actually in 2015, 49% of reports determined as CSAM were TOR resources.

CSAM Suspicion vs. Confirmed (on TOR)



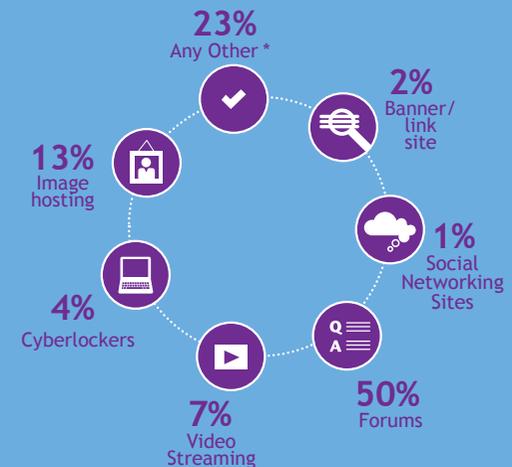
Forums are still commonly misused in the Online distribution of CSAM but no longer as an end destination but rather as the starting point – gateway. In more recent years Content Analysts noticed that in order to get to the actual Child Sexual Abuse content one has to follow a predetermined “digital pathway”.

This is connected to the widespread use of free hosting file stores and image hosting websites (cyberlockers), as a method of hosting large volumes of images which are then linked from third party sites.

Commercial CSAM

A CSAM report is categorised as **commercial CSAM** if, in the professional opinion of the Content Analyst, the CSAM was created or / intended for commercial gain, or appears to be provide/facilitated either directly through a payment mechanism, [membership basis] or indirectly through a series of linked pages.

Resources Misused for CSAM Distribution in 2015



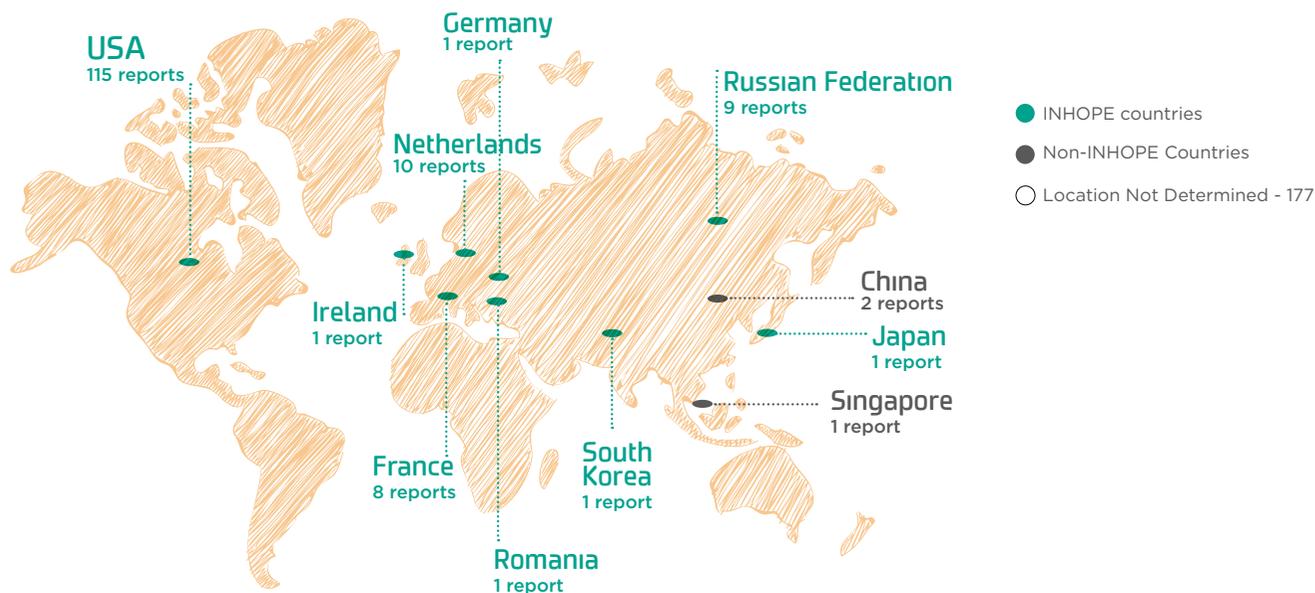
(*Mobile app related, pornographic tales etc.)

On a positive note, based on Hotline.ie's findings, Ireland continues to remain virtually free of CSAM hosting with only 1 CSAM report in 2015 and 28 in total since inception (1999). However, there is no room for complacency, as it is important we continue to implement and evolve measures, through cooperation of Government, Gardaí and Industry, which will deter people from misusing the Irish Internet facilities for illegal purposes. Procedures must be continuously improved to keep pace with the rapid

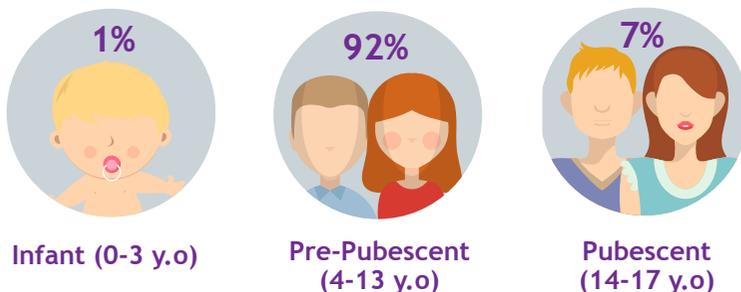
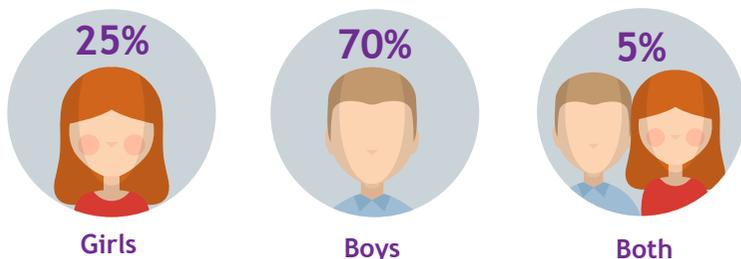
technological evolution allowing ISPAI Hotline.ie to remain at the forefront of the fight against Online CSAM. Moreover, given the global nature of the Internet, Ireland cannot operate in isolation and we are committed to continue to work in conjunction with our European and International counterparts to ensure swift action against identified CSAM hosted outside Irish jurisdiction.

Throughout 2015, ISPAI Hotline.ie forwarded 146 reports of CSAM to 8 Hotline counterparts around the

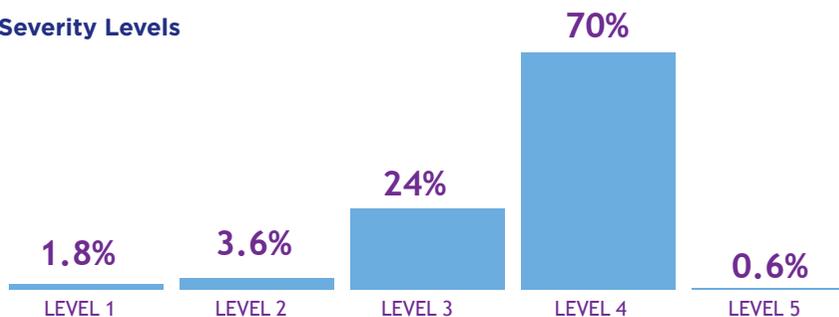
world and 3 more to the Republic of China and Singapore through Law Enforcement channels. All cases were reported to Hotline.ie and fully processed and assessed in Ireland before being forwarded to the appropriate jurisdiction for action.



The Child Sexual Abuse Images and Videos Assessed by Analysts in 2015, Depicted:



Severity Levels



It's commonly believed that girls are more likely to be in danger of sexual abuse, but the cruel reality of Child Sexual Abuse, particularly as witnessed by the Irish Hotline, is that gender is no exemption, as boys are as likely to be sexually abused and raped as girls.

Hotline.ie has seen a constant increase in Child Sexual Abuse content depicting boys over the past 3 years - 44% [2013], 42% [2014] and 70% [2015]. However, this is an obvious discrepancy between Hotline.ie and the experience of other Hotlines in the INHOPE network. While international figures for 2015 have not been published as yet, historically the content depicting boys has been around 15%. At this stage, there is no explanation for this other than the sheer volume of a given genre of sites being constantly reported and captured statistically.

A noticeable characteristic, where national data corresponds to the international one, is the age group. 92% of the CSAM assessed by Hotline.ie depicted Pre-Pubescent (4-13 y.o.) boys and girls, while the average over the 3 years for this age group is 86%. The international average over the previous three years has been 73%.

The corroborated information shows once again that the age plays a very important role to this type of offender.

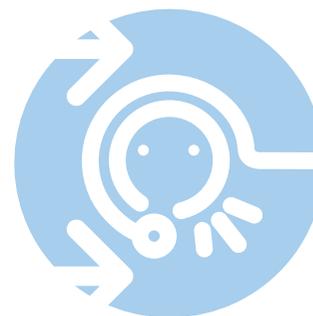
The severity levels are based on the UK Court of appeal sentencing guidelines which are used by many Law Enforcement and Social Services Agencies around the world. Summarised: (1) stands for instances of erotic posing of a child or children showing genital area, (2) explicit sexual activity of child or children but no adult depicted, (3) non-penetrative children and adult/s, (4) penetrative sexual activity between child/children and adult/s and (5) sadistic sexual subjugation or bestiality involving a child/children.

Regrettably, 70% of the CSAM identified in 2015 was assessed by Content Analysts as severity level 4. However, this is not surprising for Hotline.ie as on average, over the past 10 years, this severity level counted for 52% of all reports assessed as CSAM.

Many people find it difficult to comprehend Child Sexual Abuse and that behind every statistic is a child who has been sexually abused and exploited and, whilst images of the abuse are in circulation on the Internet the abuse is perpetuated and the victim is re-victimised ad infinitum.

The online distribution of CSAM is a global issue as quite often the child victim may be sexually abused in one country, the images of the abuse uploaded to the Internet in a different jurisdiction, hosted on servers in yet another and the content accessible anywhere in the world. That is why only continuous and cross-jurisdiction decisive action (removal at source) disrupts these criminal activities.

Let's never forget that behind Child Sexual Abuse Imagery is a real child who has been sexually abused and exploited, whilst images of the abuse are in circulation on the Internet the abuse is perpetuated and the victim is re-victimised ad infinitum.



Trends & Observations 2005-2015

The first part of the period (2005-2008) is characterised by high longevity static CSAM (content hosted at fixed locations), which it is believed to be due to massive commercial operations.

The number one method of distribution was advertising through email SPAM, basically promotion of commercial CSAM websites arriving in your mailbox. On a positive note, by the end of 2010 SPAM advertising commercial CSAM websites was virtually eradicated. However, other methods of distribution such as: bulletin boards, forums, index/link sites, cyberlockers, redirectors, proxies, P2P etc. are still being used either individually or as part of the digital path that one might have to follow to access CSAM.

2010 has also marked a decrease in commercial CSAM as seen by our Content Analysts, but up to present day commercial Child Sexual Abuse has remained an issue. It has become apparent, to Internet Hotlines, over the years that certain websites operate collectively moving together across hosting providers in different jurisdictions and advertising content across various platforms. Some may frequently change the URLs associated with their websites, even the domains, as well as their image stores and online payment mechanism.

Over the years ISPAI Hotline.ie witnessed legitimate hosting providers

or innocent websites which have been hacked with the purpose of facilitating the distribution (or even sale) of CSAM, for example redirector advertising pages; image and video stores; comment section; guest books; etc. Usually the owner of a hacked website and the company providing the hosting services are likely to be unaware of the presence of such content.

At present, whenever possible, INHOPE Member Hotlines record whether a reported website is commercial and collect information regarding payment methods employed. However, many remain as 'not determined' due to the fact that the only way to check the advertised payment system would be to conduct test transactions which are not only restricted to Law Enforcement investigations but also cannot be carried out in all EU Member States due to different national legislation. Furthermore, reports which are more than a day old are difficult to investigate since the sites may no longer be active.

Difficulties in assessing whether or not the identified CSAM may be considered commercial, plus an inability to verify the advertised payment method, hinder Internet Hotlines from accurately estimating and evaluating the evolution and true scale of commercial CSAM distribution online.

Unfortunately Aside from Traditional Payment Methods - Content is Currency. For Example, one of our Content Analysts has Come Across the Following Example Below:

"If you want to get access to our community you must prove that you are trustworthy (you should understand why). You need to send links to 5 video files with real PTHC CP* content and 5 min length or more in HQ to email address AND after your materials will be evaluated you will have to upload not less than 2 files every month to maintain your access. If you fail to provide new content after one month your account will be terminated. Links to video you provide to get access must be to public download services like ###, ### or so. Files must not be in archives! And you shouldn't use tricks and other stuff. You just won't get access if you send trash. But if you accomplish these requirements you will be given link, login and password to get inside our community." (2011)

***PTHC CP - Pre-Teen Hard Core Child Pornography**

From 2011 onwards, Content Analysts have constantly encountered scenarios in which CSAM was presented only if following a predetermined “digital path”, which means those websites would display different content based on the route the user takes. If for example, the URL is loaded directly into a browser, then the page that loads usually contains legal adult content. However, if the same website is accessed via particular gateway – which we call a referrer – the site will display CSAM. Our experienced Analysts are equipped and adept at spotting these websites and have identified a technique to circumvent the “digital path” to gain access to assess the content.

Another technique to defy detection, now observed occurring frequently, is the use of proxy service - meaning content will only be presented if for example the user has an Irish IP, while all other IP addresses are forbidden in which case the user will see an error message or legal content.

In the last 5 years Content Analysts have noted that CSAM content is becoming more dynamic. It is being moved around different hosts, different countries and

across platforms at an increasing rate to avoid detection.

Online CSAM distribution over Peer-to-Peer (P2P) networks has been a constant concern.

The highest number of confirmed CSAM reports on P2P, to date, was recorded in 2011 (14%). To conduct successful P2P report assessment can be achieved when all the relevant information is provided: name of P2P service used, exact name of the file found, specific search terms used, the time and date when content was found and, if known the apparent IP address of the host. Hotline.ie will only investigate the reported material and does not concern itself with what the reporter may or may not have downloaded. However, ISPAl and Hotline.ie do not condone the infringement of copyright by using P2P services to share copyrighted artistic works without appropriate authorisation.

Content Analysts are still concerned with the lack of P2P reports being made to Hotline.ie. Analysts have seen some of the most disturbing and abusive images of children being sexually abused on P2P. When they have tried to locate the reported file it is clear that many files on P2P services are if nothing else, very suspiciously named.

The Hotline continues to speculate that it is possible that P2P users’ first reaction on encountering these sorts of files is to



Peer-to-Peer

Refers to the interaction between online communities where members share, search and download files which are located on their computers. The essence of P2P is that end users are directly communicating with one another, rather than through a centralised server.

want to delete the listing of filenames as quickly as possible. However, it is very important that these should be reported so that people who are misusing P2P services to share CSAM content can be tracked down. Whilst we strongly recommend that users who come across these sorts of files do not open them to see what they are, we urge them to anonymously report the incident to Hotline.ie so that it can be investigated. It is of grave concern that in 2015 that there were no P2P reports.

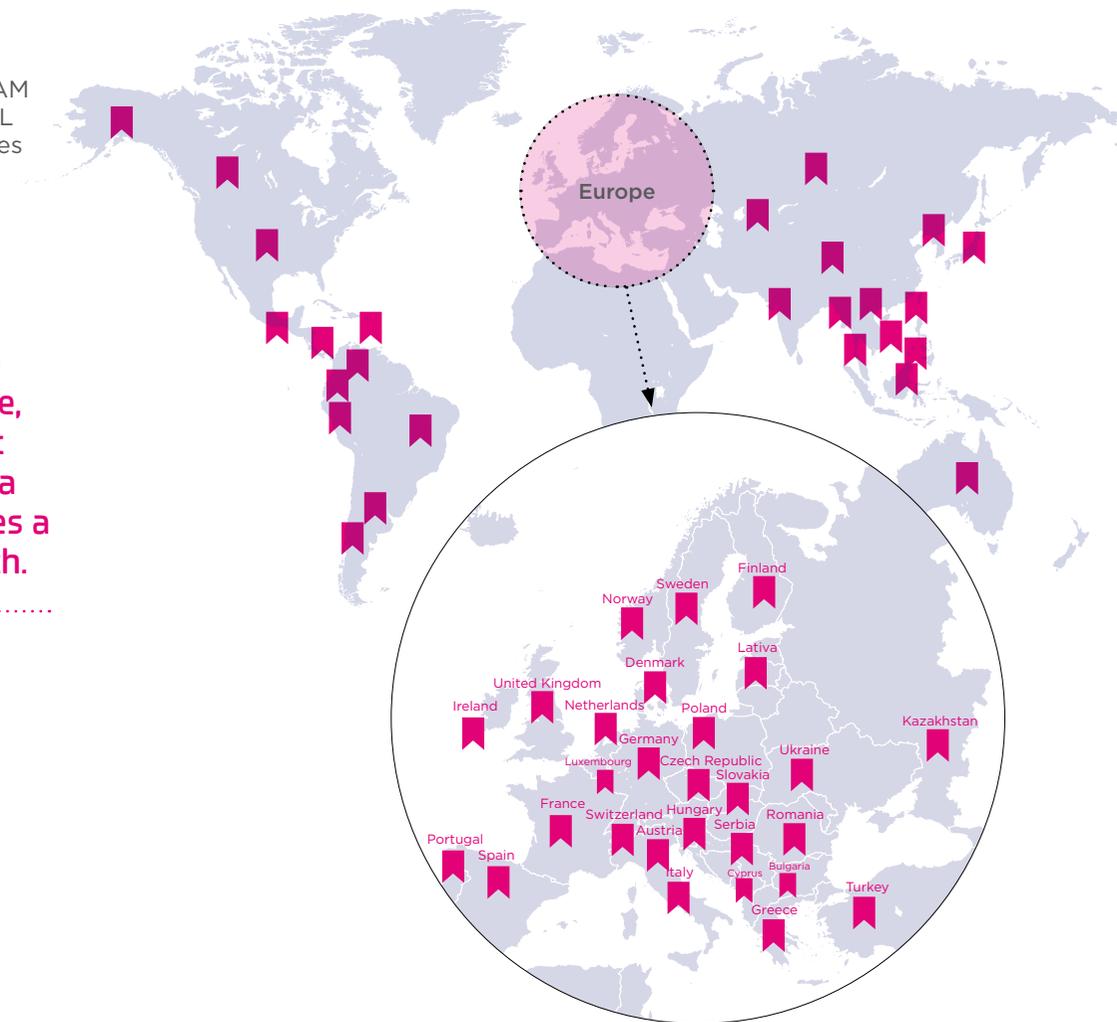
An alarming trend in Online CSAM distribution, noted by our Content Analysts is the use of TOR. The first spike of reports pointing to TOR resources was recorded in 2014, and continued throughout 2015, when 49% (1 in 5) reports determined as CSAM were TOR resources.

Currently due to the limitation of resources available to the network of Internet Hotlines, Hidden Services such as TOR, hosting CSAM may be to all intents and purposes “untouchable” particularly in relation to notice and takedown at source, however the CSAM may still be captured in the INTERPOL data base and nonetheless the services are still susceptible to conventional, intelligence led Law Enforcement investigations.

In the past 10 years ISPAI Hotline.ie has traced CSAM to 57 countries around the globe, which proves once again that Online Child Sexual Abuse is a global problem which requires a global response and approach.

57 Countries Worldwide - 28 in Europe (6 non-EU Member States)

📌 Hotspots - Locations to Which Hotline.ie has Traced CSAM Over The Last 10 Years



Challenges Ahead - National and Global

An integrated and comprehensive global response is critical to effectively combat the Online distribution of Child Sexual Abuse imagery and videos, an aspect that cannot be overstated. The study, “A Global Landscape of Hotlines Combating Child Sexual Abuse Material on the Internet and an Assessment of Shared Challenges”, conducted by the National Center for Missing and Exploited Children (USA) with the financial support of Google.org, shows there are almost 150 countries worldwide without a CSAM Hotline Service. To date there are 52 Internet Hotline in 47 countries coming together in the fight against CSAM as INHOPE. ISPAI is actually one of the founding Members of INHOPE, because Ireland has understood early on that this phenomenon cannot be tackled in isolation.



Scan the QR Code for:
 “Global Research mapping the landscape of Internet Hotlines combating CSAM”, conducted by the National Centre for Missing and Exploited Children (USA)

In terms of global response to CSAM, one of the most significant challenges is the legal definition of “Child Pornography” and what constitutes “a child”. In Ireland the Child Trafficking and Pornography Act (1998) is very specific and clear, enabling Hotline.ie to make precise and undisputable assessments. However, legislation in some areas is broad and open to interpretation, furthermore with the age of a “minor” wildly varying. That is why there can be cases where content might be deemed illegal in the reporting country but assessed as not illegal in the hosting country.

As the aforementioned Global Research shows, 71% of Internet Hotlines operate as non-profit organisations, with funding generally stemming from Government grants and contracts, EC grants, corporate financial and in-kind contributions. Thus, funding can be unpredictable, at times insufficient, which in turn may restrict and impact Hotlines technologically, limiting training opportunities, capacity building, hindering effective competition to hire and maintain qualified staff and could potentially threaten the sheer existence of Internet Hotlines.

In terms of operational challenges Hotline.ie has seen an increasing number of reports concerning suspected CSAM hosted in areas such as hidden services - dark web (TOR), proxy servers, cyberlockers, invitation only groups (closed groups) where paedophiles are trading CSAM.

Evolving digital video production technologies has contributed to an increase of video content depicting Child Sexual Abuse, over the past 5 years. This is an operational challenge for Internet Hotlines around the world as the size of the video alongside the method of distribution can translate into exceeding slow download time, restriction on the number or size of file downloads per day, limited time availability of the content at that location (such as links available for 24h). Furthermore, videos are currently reviewed manually which is extremely time consuming.

Commercial CSAM is another challenge as to actually access the content requires test transactions which are not only restricted to Law Enforcement investigations but also cannot be carried out in all EU Member States due to different national legislations.

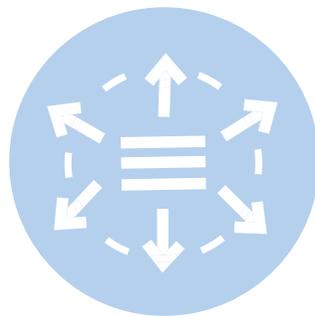
And last but not least the lack of P2P reports despite the fact that Content Analysts have seen some of the most disturbing and abusive images of children being sexually abused via P2P sites and when they have searched for a file that has been reported it is clear that many files on P2P services are if nothing else, very suspiciously named.

While the actual scale of Online CSAM distribution cannot be accurately quantified, there is no doubt that it is very large and will remain an ongoing issue particularly as global Internet penetration grows.

Organisations around the world are constrained by having to fight this global phenomenon within the framework of national legislation which varies across jurisdictions, while, needless to say, the criminals distributing this content are not operating within the same constraints.

On a positive note, the international multi-stakeholder model, in which Internet Hotlines dealing with Online CSAM reports play a crucial role, has proven successful in disrupting criminal activities, removing CSAM at source and reducing the availability of such content on the open Internet.

We believe that, in recent years, thanks to ongoing global efforts – Law Enforcement Agencies, Governments, NGOs, civil society through public reporting etc. – the Internet has become a more hostile place for online sexual offenders.



“However, this is no time for complacency, every CSAM image or video is a crime scene, documented evidence of a crime being committed – a child being sexually exploited and in many cases actually raped – so we have to continue to work most effectively and enhance our systems to ensure that we remain relevant and at the forefront of the fight against Online CSAM.”

Paul Durrant, Chief Executive of
ISPAAI and Hotline.ie Manager

Our Strategy

- ✓ **Provide free of charge anonymous reporting service** – www.hotline.ie – where members of the public may report suspected illegal content, particularly Online Child Sexual Abuse imagery and videos.
- ✓ **Maintain and strengthen the effectiveness of ISPAI Hotline.ie** in the fight against the Online distribution of CSAM, by ensuring clarity and focus of ISPAI Hotline.ie remit.
- ✓ **Strive to achieve better public awareness and visibility** as more reports may lead to more CSAM being identified, taken-down and contribute intelligence to assist LEA in child victim / offender ID.
- ✓ **Operate as a full Internet Hotline**; unlike many other Hotlines, since inception Hotline.ie has been receiving reports on all Internet services such as P2P, UseNet, TOR, etc., not solely Web.
- ✓ **Improve effectiveness of Hotline services and technology** to ensure Hotline.ie remains relevant and at the forefront of the global fight against CSAM. ISPAI has made constant sizable investment in Hotline.ie report processing database to ensure all relevant data relating to the distribution, production and proliferation of CSAM is recorded to allow research and mapping of this issue.
- ✓ **Promote self-regulation and stakeholder inclusion** which have been at the core of ISPAI Hotline.ie's model, operations and successes since November 1999.
- ✓ **Promote the NTD system in Ireland** to ensure swift, coordinated (LEA-ISP) action against CSAM when content is hosted in Ireland.
- ✓ **Drive INHOPE forward through active involvement as a founding member** to ensure international reach and decisive action against CSAM is widened and improved; Hotline.ie was one of the 11 Hotlines [of 52 in the world] involved in the proof of concept, pilot ICCAM system. When fully operational, this system will be the greatest step forward in the potential value of Hotlines' work to the fight against online CSAM since the inception of Internet Hotlines as enablers of international Notice & Takedown.
- ✓ **Joining forces with Safer Internet partners** (e.g. Webwise, ISPCC and NPC), in deploying complementary Safer Internet services: awareness, helplines and hotline to people residing in the Republic of Ireland.



ISPAI Members Co-finance Hotline.ie

ISPAI Membership in December 2015



www.ispai.ie

Internet Service Providers Association of Ireland Ltd.
25 Sandyford Office Park, Blackthorn Avenue, Dublin 18
info@ispai.ie Tel: 01 294 5280



Designed by navigatebydesign.com