

Annual Report  
2021



PEOPLE  
...NOT  
PIXELS

Real people, real harm. Your report matters.

**CONTENT WARNING:** Please be aware, the content enclosed in this publication relates to illegal content online, such as child sexual abuse and exploitation. As such, some readers may find parts of this Annual Report uncomfortable or upsetting to read.

The publication aims to raise awareness and inform. Whether you've been following these topical issues for years, or you are just beginning to learn more, this is an active conversation that requires consistent and ongoing attention and collaboration, together with long term strategic commitment from the European Commission and national Governments.

The views expressed in this publication are those of the author and do not necessarily reflect those of our members, supporters, partners or the European Union.

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Real people,  
real harm.  
Your report  
matters.

[REPORT NOW >](#)

Visit our secure and confidential web-reporting portal

[hotline.ie/report](https://hotline.ie/report)

[LEARN MORE >](#)

Follow us on

[twitter @Hotline\\_ie](https://twitter.com/Hotline_ie)



For further online safety advice, tips, and resources checkout the Webwise Parents Hub or Webwise Teachers Hub



44 MINS

Listen to Age, Sex, Location  
RTÉ Radio 1 Documentary

Available on Spotify, Apple Podcasts,  
or [play.acast.com](https://play.acast.com)

If you would like to learn more about Hotline.ie's work in an international context, the importance of cross-disciplinary and cross-border collaboration, we invite you to listen to a 44-minute radio documentary. In this sensitively made documentary you will hear accounts from a survivor of child sexual abuse, Hotline.ie and IWF Analysts, and a Detective in the Online Child Exploitation Unit of An Garda Síochána.

Whilst we are acutely aware that child sexual abuse and exploitation is an extremely sensitive and difficult topic, it can no longer be deemed as too sensitive or taboo to discuss in polite society. The cost of not knowing might be immense.

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A list of other Irish support services to help you in your search for information is available at [www.hotline.ie](https://www.hotline.ie)

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Thank you to everyone who has made a report to Hotline.ie, to our national partners, the global child protection community, and last but not least, to our sister hotlines and every single hotline Analyst across the world, doing one of the most difficult jobs imaginable.

Thank you to the European Commission and our members, who have been co-funding Hotline.ie and making this work possible.

By all working together, effectively, transparently, and supportively, we can really make a tangible difference.

Thank you, once again, for your support in 2021, 2022 and the years to come.

Our work continues every day.

The team at Hotline.ie

## Foreword: Minister of Justice

I am pleased, as Minister for Justice, to have the opportunity to write the foreword to this Hotline.ie Annual Report for 2021. It marks another year of the important, worthy and difficult work done by Hotline.ie in providing a means for members of the public to confidentially, anonymously and securely report suspected illegal content online, and in particular child sexual abuse material (CSAM).

In collaboration with An Garda Síochána, and overseen by the Department of Justice, Hotline.ie has undertaken this work for 22 years with great diligence and professionalism. Prioritising online safety is a key element in building stronger and safer communities under the Programme for Government, and addressing complex issues in this space has, and continues to be, a priority.

The 2021 Annual Report makes for stark reading. The recent trend of considerable increases in the number of reports being received and actioned by Hotline.ie has continued. In 2021, Hotline.ie received the highest number of reports on record in a calendar year, some 29,794 reports compared with 10,699 the previous year. It means that there were as many reports in 2021 as in the previous three years combined. While this reflects increasing public engagement with the service, it also potentially demonstrates a worrying increase in illegal online child sexual abuse material.

The majority of the reports related to suspected child sex abuse material, with some 14,772 assessed by the analysts at Hotline.ie as relating to child sexual abuse. Each report can involve anything from a single image to thousands of images and videos, with victims ranging in age from infants younger than three to pubescent children. Each image is a crime. Each image has a victim, or victims, who have suffered abuse,



Simon Harris TD. Minister for Justice

and who are re-victimised each time their abuse is viewed as it is shared across the globe. We must never become hardened or inured to these figures.

The 2021 report also includes, for the first time, statistics on intimate image abuse (IIA), or the non-consensual sharing of intimate images and videos. On the back of Coco's Law, the new law that Minister McEntee enacted early in 2021, the Department of Justice partnered with Hotline.ie to make reporting intimate image abuse as easy as possible for as many victims as possible. Once illegal content is reported to Hotline.ie, their experts assess the report and determine next steps, including getting the content removed from the Internet.

The initial results are encouraging. Between September 2021 and September 2022, Hotline.ie received 773 reports of suspected IIA. Of the 525 of these that Hotline.ie could take action on-contained active and publicly accessible online addresses - some 94pc have been successfully removed at source. The removal rate is very encouraging, particularly as none of the content was hosted in Ireland.

Finally, I want to thank all those at Hotline.ie for their important work and dedication, and I look forward to continued good cooperation in the years ahead.

## Welcome from our Chief Executive

As the entire world continue to grapple with the ongoing impacts of the COVID-19 pandemic, there is no question in our mind that combating the online abuse we see every day against the most vulnerable in society is still one of the most pressing societal challenges of our time. 2021 has been probably the most onerous year in the Hotline.ie's 22-year history.

When I joined Hotline.ie in 2013, the volume of public reports received that year amounted to 2,568 of which 185 were classified as illegal under Irish law and actioned. Since then, we've seen an increase year on year, and our team, tools, strategies, and partnerships had to grow, develop, and adapt to meet the challenge and ever-evolving online environment.

Reflecting on the year gone by three key milestones achieved come to mind.

1. Our world-class Content Analysts assessed, classified, and actioned 25% more child sexual abuse material reports than in the last 21 years combined. In most cases one public report led to hundreds or even thousands of images and videos. The human toll these figures represent can be overwhelming – but we can't afford to look away. We believe the increase in public reporting also signals heighten public awareness of these issues, no tolerance to child sexually exploitative content online together with the public's readiness to do the right thing and report it. Actioning more child sexual abuse material can lead to more children being identified and safeguarded. Throughout 2021, our small team of Analysts assessed and classified a total of over 29,000 public reports. This was achievable



Ana Niculescu Chief Executive

thanks to the huge strides to work more efficiently, by continuing to develop our tools and tech leveraging first-hand insights from our expert Analysts and being able to employ an additional Analyst.

2. In September 2021, we launched a new secure and confidential intimate image abuse web-reporting portal and service, which was developed in conjunction with the Department of Justice and An Garda Síochána. The team at Hotline.ie spends each and every day assessing some of the most challenging content imaginable such as child sexual abuse and exploitation, racism and xenophobia, and recently intimate image abuse (IIA). They do this because they understand the devastating impact that online abuse has on the lives of real people and know that for every image or video they remove it stops repeat-victimisation. We launched the IIA service as we understand that having your intimate images shared without your consent can cause significant distress and even have long-lasting impact on a person's life and wellbeing. The team at Hotline.ie is honoured to be able to play an active role to break the cycle of abuse, prevent re-victimisation, and support those who have been victims of IIA on their healing journey - their bravery, courage and resilience is nothing less than inspiring.

3. Staying ahead of rapidly changing technologies and understanding their potential impacts particularly in areas such as online child sexual exploitation and intimate image abuse, remains a key focus for Hotline.ie. Our national preparedness and strategy to address these issues must be framed by a forward-looking strategic outlook and underpinned by an evidence-base which will inform the steps we need to take. To that end, Hotline.ie partnered with TUDublin and ISPCC-Childline of the Irish Safer Internet Centre, to embark on a research project, first of its kind, which aims to uncover patterns of online child sexual exploitation through national hotline and helpline analysis of caseloads. The ultimate goal is to advance our understanding of trends in perpetrator behaviour (conduct, contact, content) including grooming and debunk strategies and tactics used to lure and coerce children into sexually exploitative acts. This research project is made possible with grant funding from the End Violence Against Children and the Technology Coalition Safe Online Research Fund.

“We are committed as ever to continue to disrupt the trade in illegal content and break the cycle of abuse. To do so we need to remain responsive, agile, and continue to collaborate strategically in local, European, and even global opportunities.”

Since the Hotline.ie inception 22 years ago, we have learned that any digital platform and service will be misused for nefarious purpose. This occurs regardless of the type of the platform/service, or its intended use. In combating child sexual abuse and exploitation online and other forms of online abuse, no one is doing it alone. We are committed as ever to continue to disrupt the trade in illegal content and break the cycle of abuse. To do so we need to remain responsive, agile, and continue to

collaborate strategically in local, European, and even global opportunities.

I would like to use the opportunity to extend our heartfelt gratitude to you – members of the public - for your willingness to report suspected illegal content online, to our Board of Directors and members of Hotline.ie for your ongoing support and funding of the hotline service; to acknowledge the oversight, leadership and ongoing support of the Department of Justice, the invaluable collaboration and long-standing partnership with An Garda Síochána; and to the European Commission for the EU-wide strategies, policies and continued Safer Internet grant aid co-financing of EU-based hotlines and Safer Internet Centres.

Finally, a word for our team of dedicated Content Analysts whose unwavering commitment and wealth of experience has been central to our success in actioning unprecedented high volumes of illegal content online.

This Annual Report stands testament to why the work of Hotline.ie is more important than it's ever been, and the impact that we can achieve by working collaboratively in partnership with tech companies, government, law enforcement and the third sector both at national and international level.

We look forward to reporting further progress next year.

Thank you.

# Contents

About Hotline.ie	1
Journey of a report	3
What to report	4

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## Statistics and Findings 5

Context and the dataset	6
Statistics & findings	7



## Online Child Sexual Abuse & Exploitation 9

Know the law	10
Statistics & findings	11
The children in the imagery	12
CSAM distribution	13
Hotline.ie Analyst testimonial	14
Services misused for CSAM distribution	15
Snapshot of CSAM hosting patterns	18
N-light research project	20



## Intimate Image Abuse 21

Know the Law	22
What is intimate image abuse?	23
Words matter, call it for what it is	23
New Hotline.ie IIA service launched	24

Statement of purpose & the IIA dataset	25
The people who have suffered from IIA	27
Hotline.ie Analyst testimonial	29
Signposting	30



## Racism and Xenophobia 31

Findings & insights	32
---------------------	----



## Financial Scams 34

Statistics & findings	35
-----------------------	----



## Partnerships 37

Building partnerships for tangible impact	38
Working in partnership for good	39
Our Members	41

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Glossary of terms	42
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## About Hotline.ie

**Hotline.ie is the Irish centre of expertise combatting illegal material online. We are a not-for-profit organisation working in close collaboration with law enforcement, Irish government, online services providers, and NGOs, to make the Internet a safer and more inclusive place for children, young people and adults alike.**

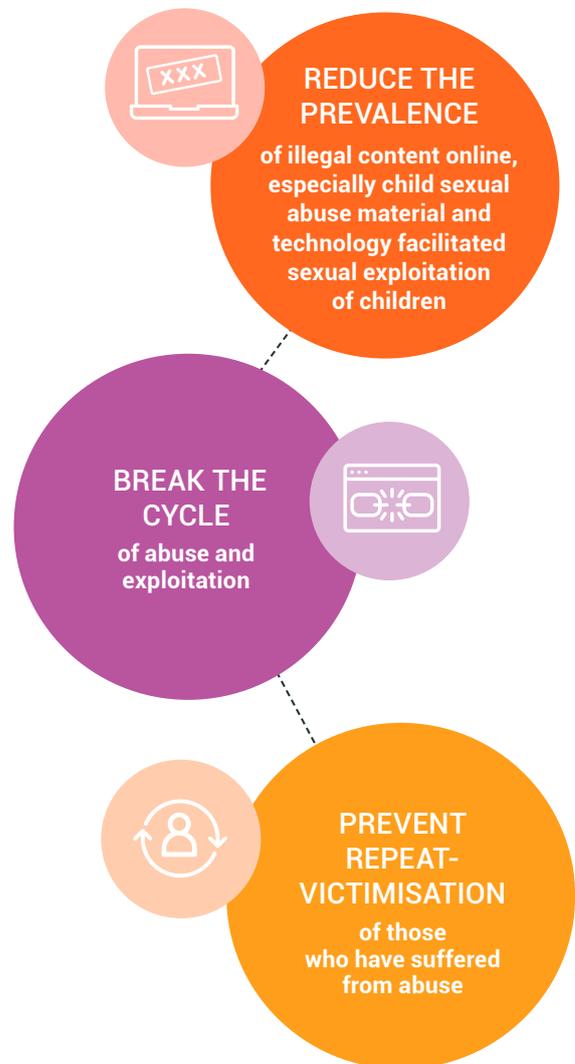
We have been providing people residing in Ireland with a secure and confidential reporting channel for over two decades. When Hotline.ie was established (1999) some of today's big tech companies weren't even a thought in their founder's minds. Since, the Internet and its place in society has been changing at a very fast pace, from fringe usage to being at the heart of day-to-day life, and more recently having conversations on the metaverse iteration. However, the values and victim-centred culture that led to our creation, are just as relevant and true today.

The team at Hotline.ie never loses sight of the fact that, whilst we are actioning digital content, namely illegal images and videos online, it's about real people, real harm and real suffering. The suffering captured in this imagery and knowing that it could be found and further shared online can haunt a victim of abuse for lifetime.

Whilst we work in close collaboration with law enforcement and online service providers to have illegal material swiftly removed from the Internet, the Hotline.ie web-reporting portal is simultaneously distinct and independent from law enforcement and any one online service provider (own) reporting channels.

This means, Hotline.ie handles reports across a wide variety of online services and platforms. This is important as year on year we've been witnessing illegal material being spread across all available digital mediums, with some online services being misused to serve as meeting environments (i.e. forums, chatrooms, etc.), while others, i.e. image stores, serve more as "end-destinations", in other words where the content actually resided.

The team at Hotline.ie works to:



Our work relies on compassionate and resilient staff members, who are highly-skilled, police trained and internationally certified, and who assess every single report that we receive, against rigorous standards and by reference to Irish law. The unwavering commitment and relentlessness of the team at Hotline.ie, placing the interests of victims above any self-interest or preservation, is nothing less than inspiring.

Global problems such as child sexual abuse require global solutions and, that is why Hotline.ie has been an integral part of a multifaceted European and international ecosystem, working collaboratively with a diverse mix of stakeholders, since inception.

## Partnership approach

We work collaboratively with a diverse mix of Government and inter-governmental agencies, law enforcement, online service providers, NGOs at national, European and international level.

At a national level, Hotline.ie's operational procedures are approved and overseen by the Department of Justice and we work closely with

An Garda Síochána and our members. We are also an integral part of the Irish Safer Internet Centre alongside Webwise, ISPC-Childline and National Parents Council; and we are a member of the National Advisory Council for Online Safety (NACOS).

Hotline.ie is a founding member of the International Association of Internet Hotlines (INHOPE) and works in partnership with 49 other hotlines on 6 continents to ensure child sexual abuse material is removed from the Internet, at source, irrespective of where in the world the content is hosted.

## How we are funded

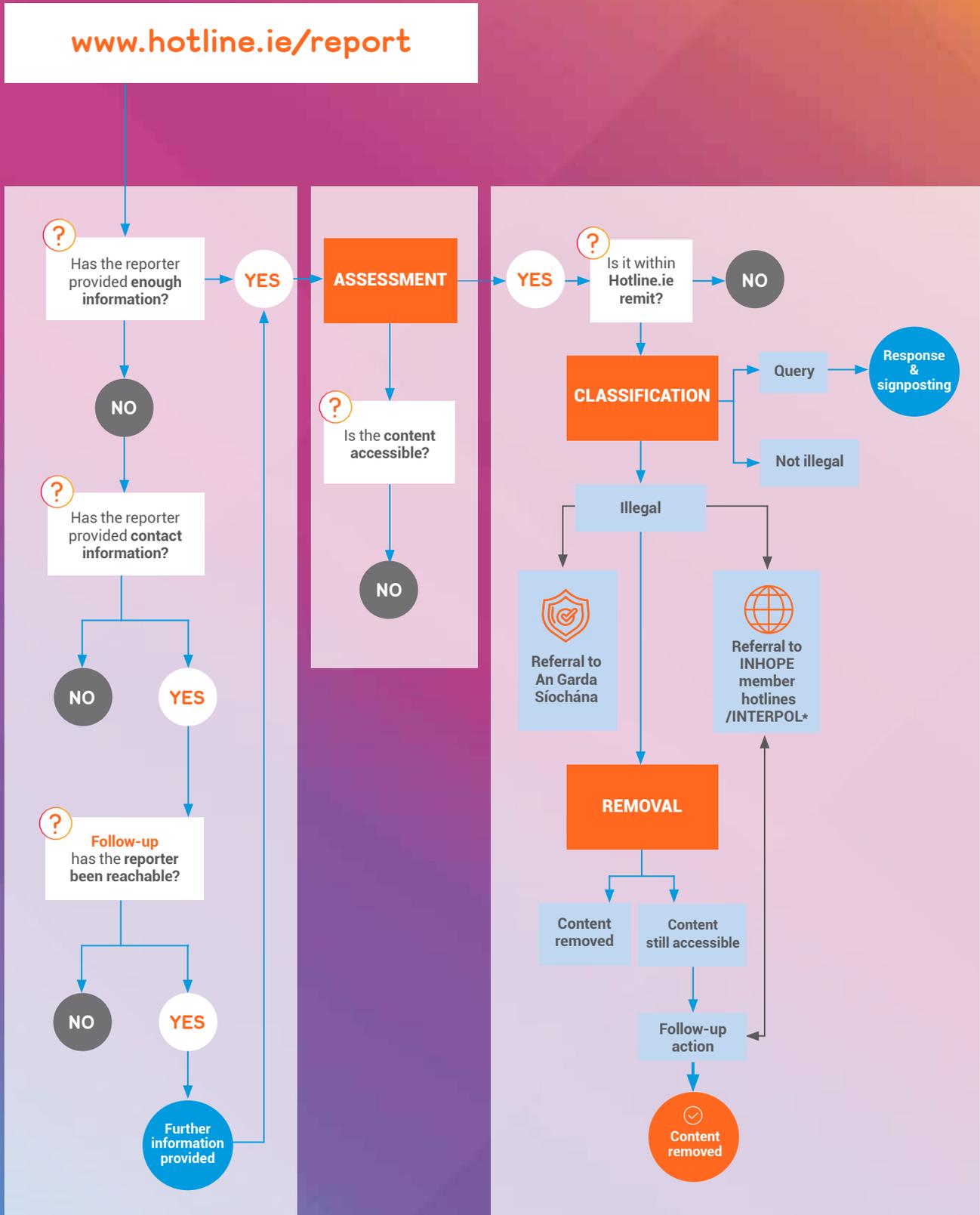
We are a not-for-profit and our work is co-financed by the European Union through grant aid under the Connecting Europe Facility: Safer Internet Programme and by our members, who are tech companies, namely search providers, mobile operators, hosting and internet service providers. Our resources are finite, and we encourage others to play their part whether by reporting suspected illegal content online to [hotline.ie/report](https://www.hotline.ie/report), funding us, or collaborating on the development of best practices, tech and research.

We care.

We remove.

We disrupt.

# The journey of a report



\* This step only applies to reports classified by Hotline.ie Analysts as CSAM, and especially important when the material is hosted outside Irish jurisdiction

## What to report

**Hotline.ie only handle reports referring to suspected illegal content encountered online. Urgent situations where persons may be in immediate danger should always be reported directly to An Garda Síochána.**

You can securely, anonymously and confidentially report to Hotline.ie incidents of:

- Child sexual abuse material (i.e. image, video, text, non-photographic child sexual abuse content such as drawings, computer generated etc.)
- Activities related to the sexual exploitation of children i.e. child grooming
- Non-consensual sharing of intimate images/video also known as intimate image abuse
- Racism or xenophobia
- Financial scams purporting to be Irish financial services or have Irish contact details or that appear to have originated from Ireland

To turn the tide on cyber-abuse, cybercrime, repeat-victimisation, whilst creating a digital world that is safe and inclusive for the most vulnerable in society, and each one of us, the importance of reporting cannot be overstated.

While the rapid removal of illegal content online is extremely important to avoid further victimisation and minimise the perpetuation of online harms, of equal importance is a victim-centred approach, to ensure for example that the children in child sexual

abuse imagery may be identified and safeguarded, and the perpetrators brought to justice. This is also particularly true in respect of reporting intimate image abuse online financial scams, and racist and xenophobic incidents.

Reporting is ultimately about, regaining control, challenging the “normalisation” of harmful and toxic behaviours, avoiding desensitization to real life harm and suffering, and playing your part for a safer and better tomorrow.

Last but not least, reporting also provides the evidence-base and informs on areas for policy intervention, emerging online threats and trends together with the development of tailored solutions for early intervention, awareness and prevention education, to name a few.

Just because you click away, it doesn't mean it's gone. If you suspect something to be illegal online, even if in doubt about the person's age, always report it to [hotline.ie/report](https://hotline.ie/report).

Hotline.ie's world-class Analysts assess every report that we receive, when the content is assessed as probably illegal under Irish law, it is subsequently classified. The next step is to trace the content's location. The trace wouldn't tell us where the picture was originally taken but rather where it is hosted on the Internet. Our Analysts will work with partner organization to make sure it is removed at source as quickly as possible and referred to law enforcement following applicable agreed processes and procedures.

## Statistics & Findings



29,794

in 2021 Hotline.ie received nearly  
the same amount of reports as the  
previous three years combined

## Context and the dataset

The Hotline.ie Annual Report aims to highlight the challenges and achievements in tackling illegal content online, primarily the distribution, availability, and proliferation of child sexual abuse and exploitation, intimate image abuse, racism & xenophobia, and financial scams that target Irish residents.

It provides an overview of the important work we carry out for the benefit of all society, outlines key statistical findings from the year gone by and contextualises our work and contribution to European and international efforts to combat illegal material online.

We have undoubtedly achieved a great deal since our inception in 1999, and we fully understand the challenges and complexities that lay before us and we believe there is a great deal yet that can be done. Hotline.ie will continue to stand firm and it is committed as ever to enhance its response

to become even more impactful, strengthen its partnership, continue to learn, and adapt within an ever-changing national and global ecosystem.

While the figures and findings included in this report make for uncomfortable reading, we hope it sheds light on some difficult topics which can no longer be deemed too sensitive or taboo to discuss in polite settings, particularly when the cost of not knowing might be immense.

The dataset, unless otherwise specified, refers to the period from January 1st to December 31st, 2021.

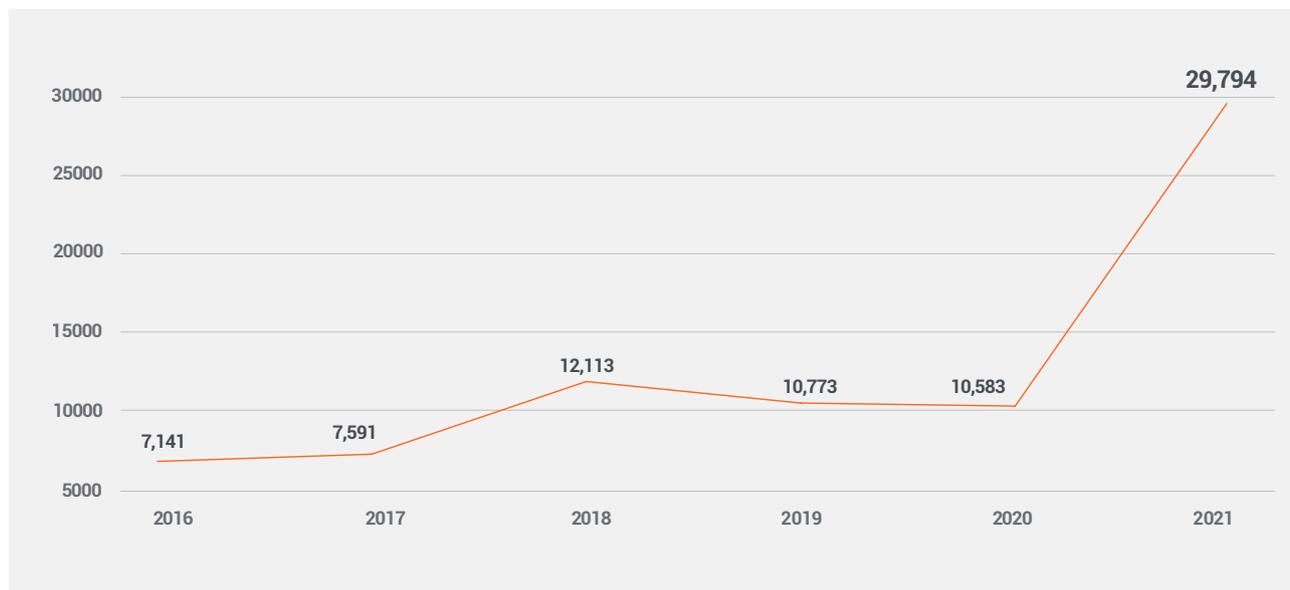
The figures and findings included in this publication are predicated on reports received from the public by Hotline.ie. Under current operational procedures, approved by the Department of Justice and An Garda Síochána, Hotline.ie is not mandated to proactively search for child sexual abuse material (CSAM) on the Internet. However, when we receive a public report (i.e. website) and there is evidence, for

example other links being displayed using explicit terms or keywords commonly associated with CSAM suggesting further illegal content would be available on other linked websites, we can follow those links. If further illegal content is indeed accessible or displayed on those other websites, we will derive a report and action it.

The percentages are rounded to the nearest whole number.

## Statistics & findings

### Annual volume of reports received by Hotline.ie



Annual volume of reports received by Hotline.ie

1 report = from 10(s) to 100(s) of images



In 2021, Hotline.ie received the highest number of reports on record in a calendar year, namely 29,794 reports (vs.10,699 reports in 2020), nearly the same amount as the previous three years combined. Benchmarked against the all-time annual average of reports (1999-2021 incl.) 4,935 reports, in 2021 Hotline.ie received, assessed and actioned 504% more reports.

When a report is submitted to Hotline.ie there is usually a specific reason given or implied by the reporter, to which we refer to as a "suspicion". Following report assessment our Analysts will assign a "classification" which can either confirm or differ from the reporter's suspicion.

83% of the total reports were submitted under the suspicion of child sexual abuse, while other suspected illegal content - financial scams, racism & xenophobia and intimate image abuse\* equated to 5%. The remaining 12% related to material that was outside the remit of Hotline.ie or queries.

At most basic level, a report refers to a "single" reference of suspected illegal online content. This can point towards anywhere online, for example to a single image, a chatroom sharing images, or an entire website dedicated to the sharing of illegal material. As such, a "single" URL or web address reported to Hotline.ie, by the public, can result in the assessment of hundreds of images

and/or videos, often linking and leading to other websites sharing further illegal material. Thus, the significance of even a single report should not be overlooked, whilst the number of reports merely serve as an indicator to the true scale of content that Hotline.ie Analysts witness.

Each report that Hotline.ie receives (anonymous or not) is dealt with utmost diligence and in accordance with rigorous standards and by reference to Irish law. Where the material reported is assessed and classified as outside of Hotline.ie's remit, and where the reporter has provided contact details, our Analysts will use all reasonable efforts to provide assistance and signposting to relevant support services available in Ireland.



Other classifications    Illegal reports    Public reports

\*The intimate image abuse (IIA) service was launched in September 2021, and as such the number of reports included in the sample refer to those received by Hotline.ie in the period September to December 2021, as opposed to all other categories received over the full calendar year.

Reports classified as insufficient detail, outside Hotline.ie remit, not accessible, and not found, are collectively referred to as "non-actionable reports". This is due to the fact that our Analysts would either not have sufficient information to ascertain which content is being reported, how to access it, or the content may no longer be online or accessible. As such no further action would be possible. Outside Hotline.ie remit classification refers to any issues not covered by Hotline.ie's stated remit, such as but not limited to: copyright infringement, sale of drugs, sale of documents or personal data etc. Content already removed is usually assigned when the reported webpage clearly indicates that the content was removed. This may occur when, for example, the content owner has deleted it; or it was in breach of the online service provider terms & conditions. In this event, our Analysts have no way of knowing beyond any reasonable doubt whether the content would have been potentially illegal under the Irish law, and as such the only classification that can be assigned is content already removed.

## Online Child Sexual Abuse & Exploitation



# 1 in 4

CSAM reports found to contain  
images/videos which appeared to have  
been generated by children themselves

## Know the Law

**Child sexual abuse and material it is illegal** under the Child Trafficking and Pornography Act 1998 as amended by the Criminal Law (Sexual Offences) Act 2017. Technology facilitated child sexual exploitation (child grooming) is also covered under a number of offences in the Criminal Law (Sexual Offences) Act 2017.

- ! Engaging in any sexual acts with a child under the age of 17 **is a crime**.
- ! **It is an offence** to knowingly produce, distribute, disseminate, print, publish, import, export, advertise, sell, supply, or make available child sexual abuse material, legally called "child pornography".

## Did you also know?

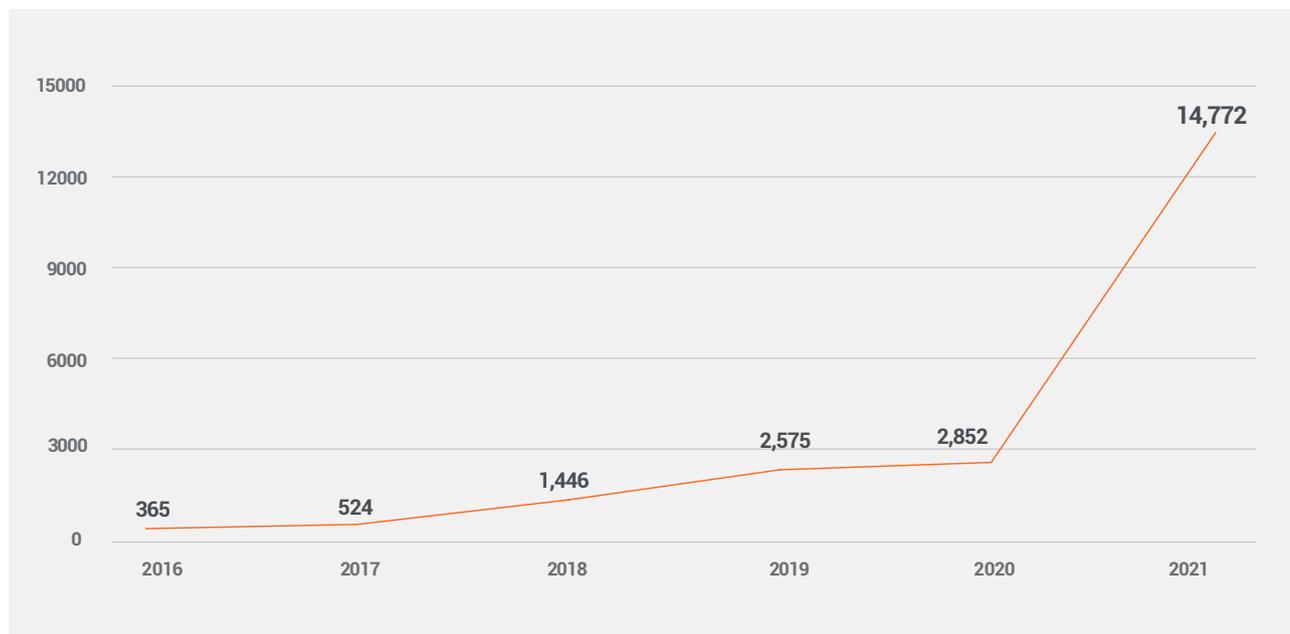
- ! **It's a crime** to send sexually explicit images, videos or messages to a child under the age of 17.
- ! **It's a crime** to expose a child to sexually explicit acts or to pornography.

**"Child pornography"** is defined as **any visual representation** that shows a person who is or is depicted as being a child and who is engaged in or is depicted as being engaged in **real or simulated sexually explicit activity**. This would also include: e.g. cartoons, computer-generated animations or imagery, pseudo-photographs, to name a few.

## Statistics & findings

### Annual volume of reports classified as child sexual abuse material

— Annual volume of reports classified as CSAM



In 2021 Hotline.ie received, assessed, classified, and actioned 25% more child sexual abuse material reports than in the last 21 years combined.

Of the 23,132 reports received under online child sexual abuse material suspicion, Hotline.ie's world-class Analysts classified 14,772 of these reports as CSAM, which in most cases contained hundreds of images and videos, or gallery-style repositories.

The scale and rate of change is unprecedented, however Ireland is not alone; similar findings have been captured and illustrated statistically by sister hotlines from across the globe such as the US National Center for Missing and Exploited Children (NCMEC), the UK Internet Watch Foundation (IWF), EOKM in the Netherlands, to name a few.

Of the remaining reports submitted under CSAM suspicion 25% were classified as (legal) adult pornographic content, 26% as age-inappropriate child posing, 42% as content already removed (see Glossary of Terms), whilst 7% were non-actionable reports (i.e. insufficient detail).

### Total CSAM 2016-2021

**22,534**

Undeniably the scale and complexity of online child sexual abuse and exploitation is on the rise, however it is encouraging to witness an increase in public awareness, a general understanding of the importance to report, and willingness to report. We believe this sends an extremely powerful, zero tolerance to child sexual abuse message.

Over the last three years, Hotline.ie has witnessed an increase in the accuracy of public reports where 64% of reports submitted under CSAM suspicion have been assessed and classified as such, whereas in 2017 only 9.4%.

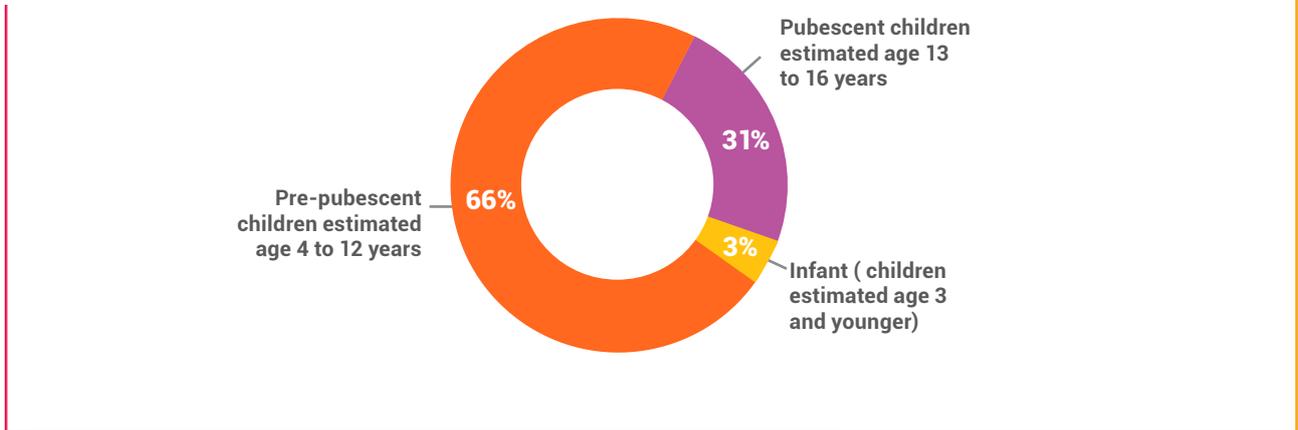
These findings further demonstrate why collaborative efforts to protect children within Ireland and abroad, to prevent and respond to these crimes, have never been more important.

# The children in the imagery

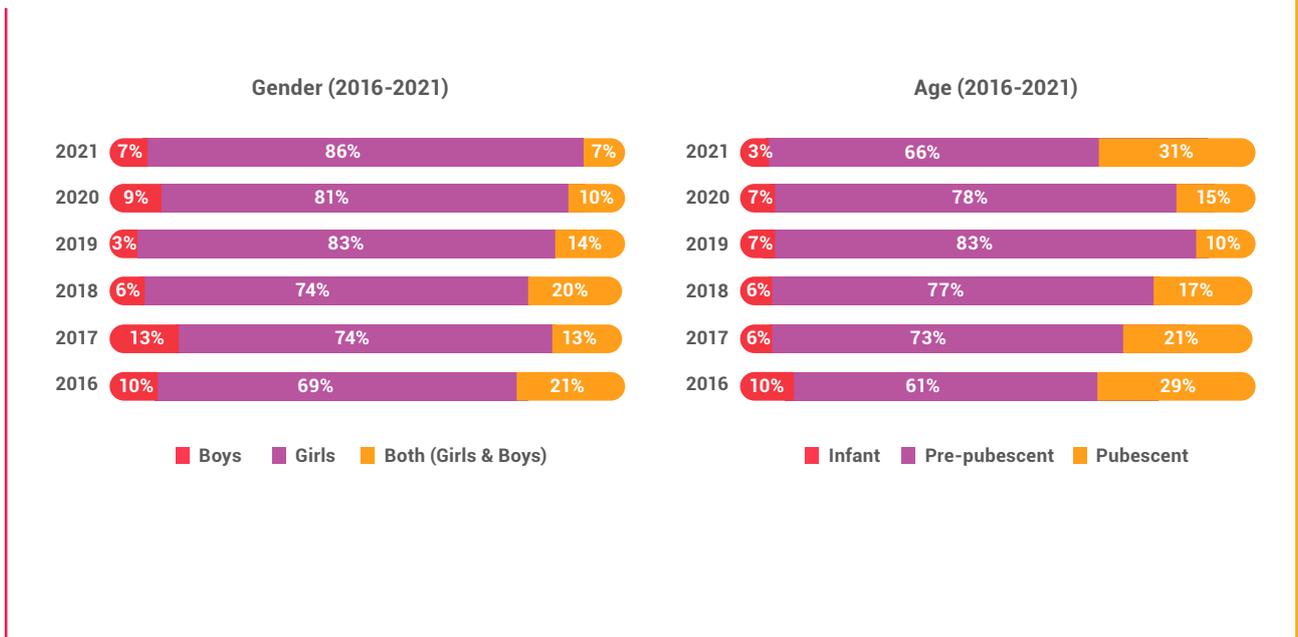
## Gender breakdown



## Age breakdown



## Comparative analysis



## CSAM distribution



The depth of abuse witnessed was immense. The images and videos depicted children of all ages and genders being subjected to sexual abuse by men and women, or being forced to act out sexual activity while being filmed or photographed. At the “lower” end of the spectrum the imagery showed children being explicitly posed, with an emphasis on the genitals, whilst the majority showed severe abuse of penetrative sexual acts between adults and children, even cases of sadistic torture involving children. Each one of these images is an aftershock of the initial abuse that will continue to do damage until they are removed, and so it remains imperative that we act as quickly as possible to do so.

Sean, Hotline.ie Content Analyst

1 in 4 CSAM reports contained images and videos which appeared to have been “self-generated” by children. This marks a 226% increase over 2020 figures, continuing the upward trend of incidences of “self-generated” material that has been witnessed and reported over the last few years.

The causes of “self-generated” or “self-produced” material are complex and varied, thus understanding the context of production and/or sharing of the material is extremely important to ensure an appropriately tailored response. Sometimes it is extremely difficult, even for human Analysts to ascertain the cause without extensive context and as such a case-by-case approach is always required.

Terms such as “self-generated” and/or “self-produced” are only meant to be descriptive of the means by which an image or video came to be, whilst devoid of victim-blaming connotations, with due account that a child cannot consent to their own abuse nor can they be complicit in the abuse.

Generally speaking, there are three broad categories of “self-generated” material: (1) “self-generated” content that is not sexual in nature but may be misappropriated and used in connection with child sexual exploitation and abuse online. Often the victims may be unaware, such material is harmful primarily because it facilitates offender activity. In some cases, this material can be digitally manipulated to appear sexual, and thereafter even used to blackmail children. (2) “Self-generated” material shared between teens\* (peer to peer) and (3) Coerced\*\* “self-generated” sexual imagery or

videos depicting sexual activity. Depending on the circumstance of its production and the forensic indicators within the imagery, the content in itself could meet the threshold for child sexual abuse material.

\*younger children cannot consent, and therefore “self-production” involving them cannot be considered in any way “voluntary”.

\*\*the child subject to coerced “self-production” as a result of i.e. grooming, may not perceive themselves as victims, or fully comprehend the extent of being a victim, and may even potentially believe their actions to be their own (voluntary).

The images/videos classified by Hotline.ie Analysts as “self-generated” CSAM, would primarily fall into the third category outlined prior. Hotline.ie Analysts have often noted, evidence that would indicate grooming or coercion by adults, particularly in the video material, such as a child receiving compliments, instructions or even threats e.g., over video chat, other times from someone present in the room although not visible in the recording.

It is hard to overstate, child sexual abuse imagery is documented evidence of a crime being committed, a child being sexually exploited and often actually raped. It involves real children; it is deliberate and rarely accidental. When the image/video of this crime is uploaded to the Internet it becomes a permanent record of the child’s abuse and suffering, whilst with each repeat viewing or sharing the child is further re-victimised.

## Hotline.ie Analyst testimonial



41% of the “self-generated” material we’ve seen reported to Hotline.ie in 2021, appeared to have a commercial element attached to it. This is a conservative estimate as only obvious signs of commerciality are used to record it. I’m referring in particular to forums that seemed to be dedicated to uploading captures of “self-generated” imagery, for example snapshots from webcam videos, which were presented as “previews” to material that would only subsequently be accessible through premium subscription to various cyberlockers. Furthermore, the “preview” imagery itself often hidden behind URL shortened links that tend to commercialise the act of following a link by collecting data or redirecting through advertisements. The scale of this specific problem could indicate that there is significant financial incentive to not only distribute this material but to also produce it.

“Self-generated” CSAM is particularly insidious. It’s a child’s innocence or vulnerability being exploited. Children are being targeted at a mass scale through any platform imaginable or being opportunistically taken advantage of. The problem is ever increasing and what we are seeing reported through the hotline service is undoubtably nothing more than a fraction of it.

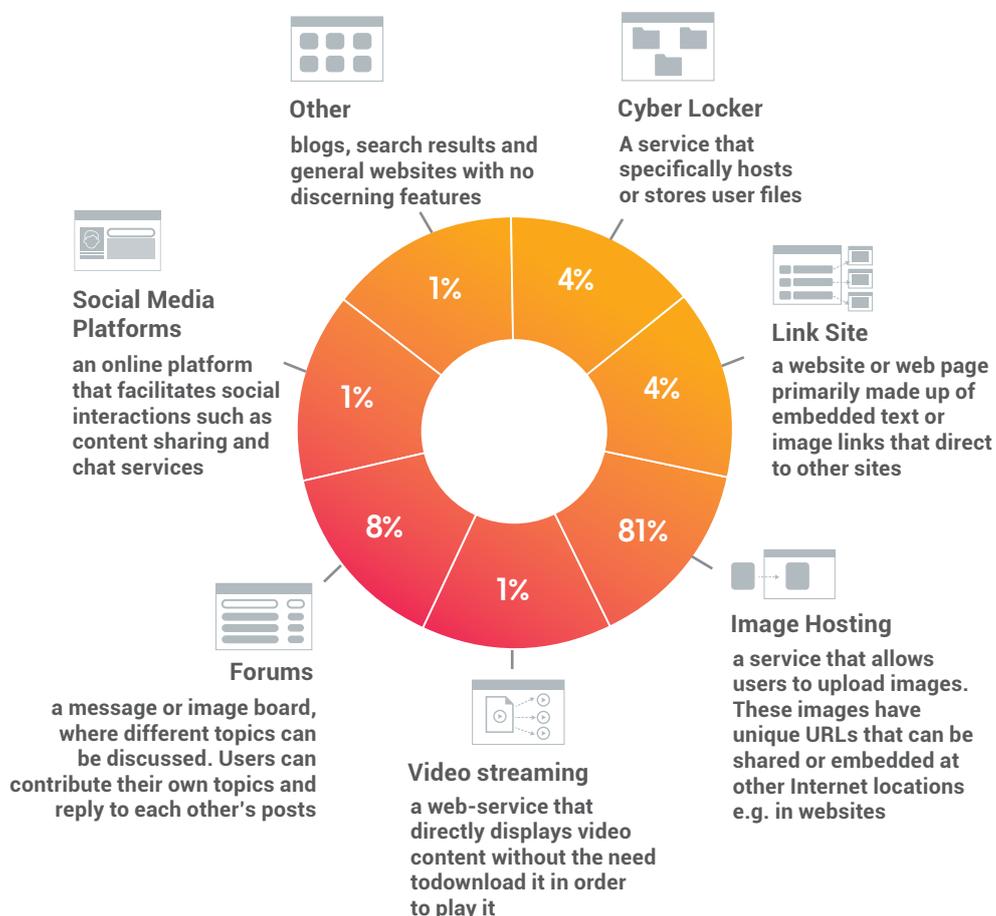
Sometimes even casual images of children can be misappropriated or placed in contexts that sexualises them. We often see innocent images, such as beach photos, scraped from social media, being shared on forums and becoming subject of graphic sexual commentary. These comments will be full of requests for names, addresses and social media accounts, or requests for the images to be digitally altered to portray the children naked or engaged in sexual acts. It’s extremely dangerous behaviour that occurs openly on the Internet, and while the latter crosses the legal threshold and would constitute child sexual abuse material under the Irish law, there’s a wide range of similar behaviours that exist in a grey area. We aim to disrupt this as much as we can when it’s reported to us, but it’s part of a wider societal problem that needs to be talked about. Any child can be a target, not just ones that have suffered direct sexual abuse. These aren’t just images or sexualised comments that exist in a vacuum, real children are being affected by this.

Sean, Hotline.ie Analyst

Additionally, of the reports assessed as online CSAM, 9% also displayed computer generated or drawn content depicted gross child sexual abuse, which is illegal under Irish law. Reports of this type of “virtual” material have steadily increased over the last five years, with 2021 being an all-time high. This is a concerning trend as it seeks to normalise the consumption of child sexual abuse imagery;

in an attempt to desensitize from the physical and psychological harm suffered by children who have suffered from sexual abuse and exploitation. Hotline.ie Analysts have often seen disclaimers alongside “virtual” CSAM claiming “no child has been harmed in the process”.

## Services misused for CSAM distribution



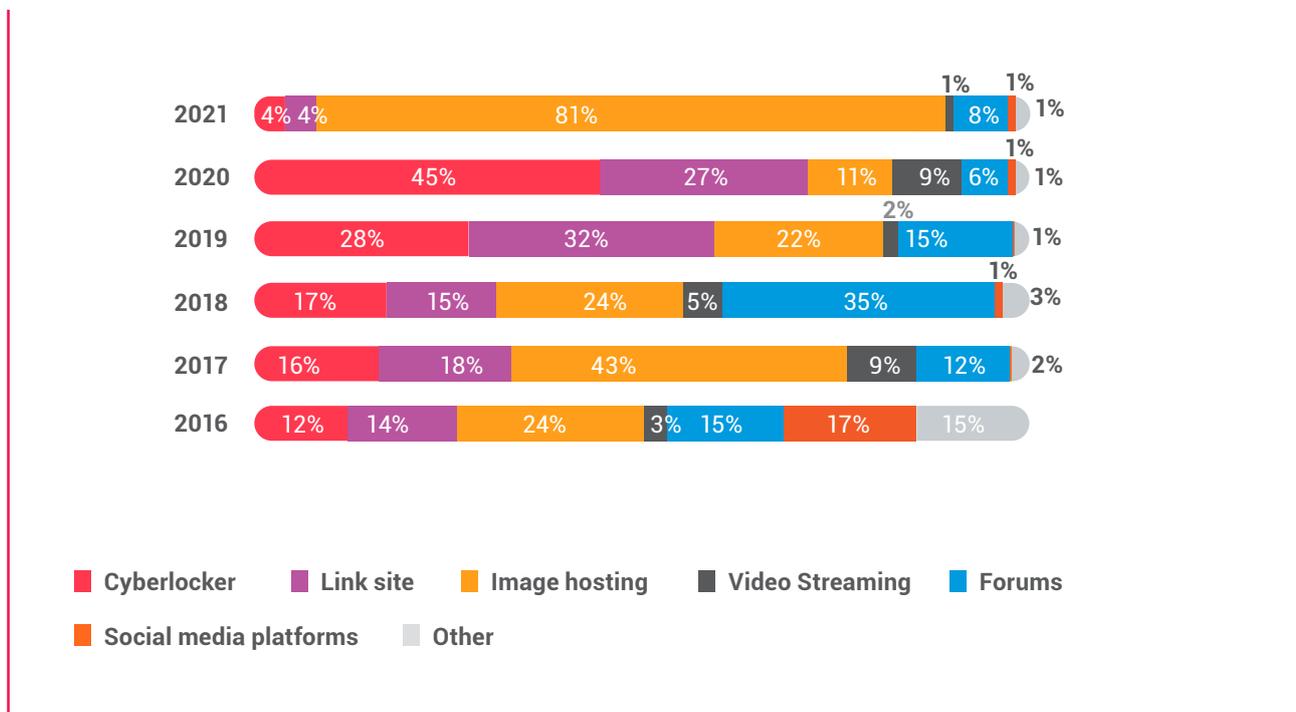
**Disclaimer:** While the figures above showcase the type of resources misused to share CSAM, they are only a snapshot, stemming from the assessment of all public reports made to Hotline.ie; should not be misconstrued as a complete picture of how CSAM is distributed across, on the Internet.

Hotline.ie figures show, that in 2021, image hosts were the most misused resource for CSAM distribution. As seen in the adjacent infographic, it is a marked increase over previous years. Generally speaking, image hosts act as a repository for images of child sexual abuse that can be embedded or shared across other online services or platforms, such as forums or social media sites. The use of different platforms linked in this manner, is one method that perpetrators tend to use in an attempt to prolong the lifespan of material online.

Perpetrators are becoming more tech savvy and agile; when one path to distribution is blocked, they find new methods and new platforms to misuse or even platform hopping tactics. Hotline.ie Analysts have noted new image hosts being misused regularly to replace the “old”, or those becoming more restrictive and hostile to CSAM. This is not unique to image hosts, similar movement patterns have been seen with forums and cyberlockers.

Some perpetrators also use “breadcrumbing” techniques, meaning indicators of CSAM that can appear innocuous to the untrained eye, planted on a website or anchored in comments. A common example, an image or text embedded with a URL, that when clicked leads through a number of hops at different Internet locations or across platforms, before eventually displaying CSAM. These “hops” could be any type of digital resource / service / medium and in most cases would not display illegal material themselves, to preclude from their role in the wider context. However, Hotline.ie Analysts through ongoing expert training and by continually honing and building on the expertise accrued over decades, are equipped to identify, disrupt and ultimately have these CSAM distribution points and networks removed/dismantled from the open Internet, to prevent the spread of CSAM and prevent re-victimisation of children who have suffered from sexual abuse and exploitation.

## Comparative analysis



In 2021, Hotline.ie traced CSAM as being hosted in 42 countries, the widest distribution across countries since our inception (1999).

The top three hosting countries amounted to 65% of the CSAM, whilst the top ten accounted for 91%. The increase in reports regarding specific image hosts led to a surge in reports traced to Moldova from less than 1% in 2020 to 19% of the total in 2021. There was also a significant increase in content traced to Hong Kong, with 5% in 2021 compared to 1% the year previous, India similarly accounted for 5% while never having had an incident of CSAM reported to Hotline.ie before. The reports regarding content in these two countries related to CSAM forums that were hosted with specific online service providers.

As certain hosting providers may be taken down or pressured into compliance, in certain jurisdictions, time again this has led to a migration from the “old” hosts to “new” ones operating in more permissive jurisdictions.

Only seven reports were traced to Ireland in 2021, and six of these were cases related to child sexual exploitation that had been reported initially as Intimate Image Abuse.

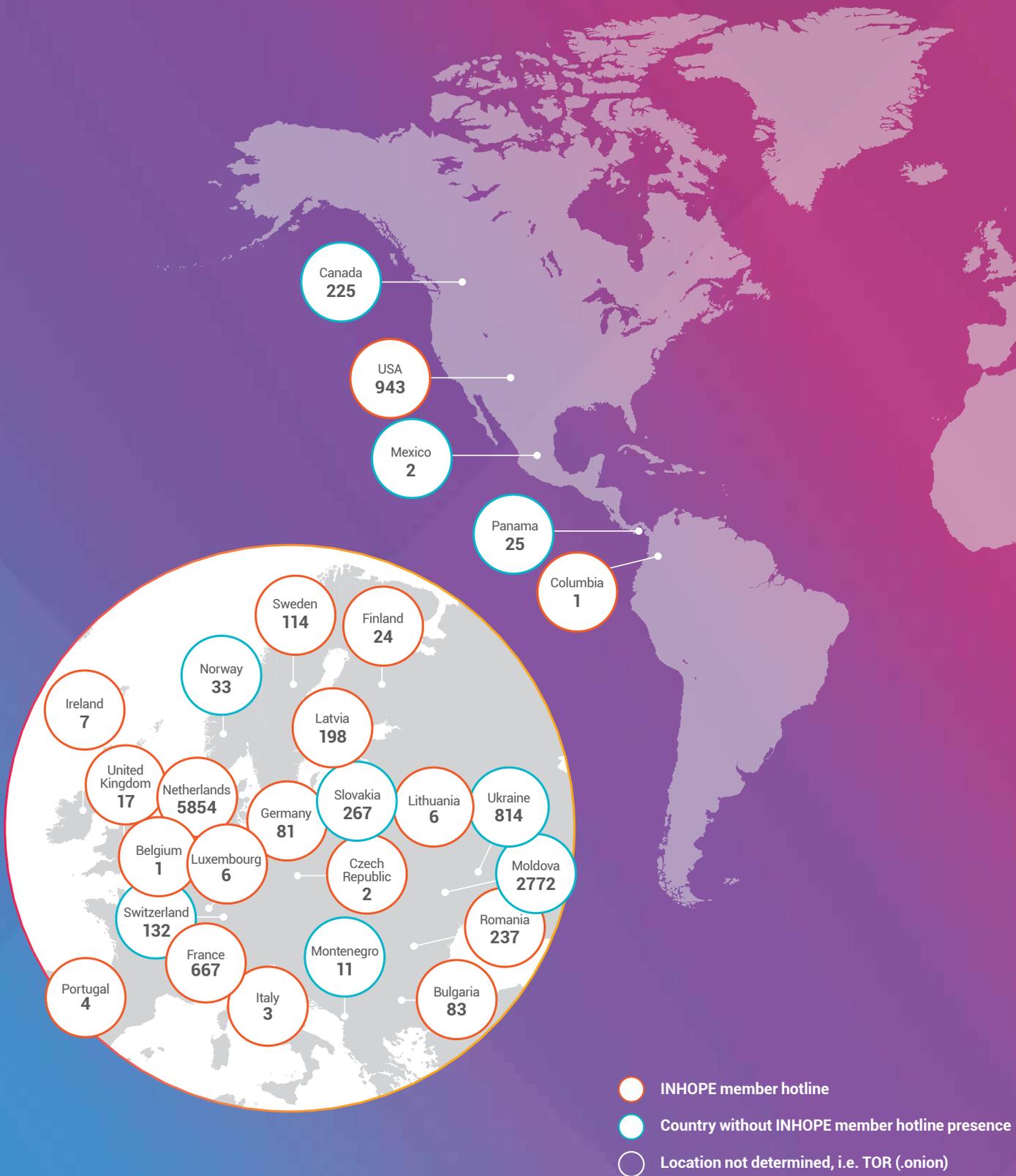
Each CSAM instance traced to Ireland was removed within twenty-four hours, ensuring that Ireland continues to remain a hostile hosting environment for CSAM.



Removing any imagery of child sexual abuse from the Internet is paramount. Coming across this type of content accidentally can be harrowing for anybody, it goes against any fundamental idea of goodness or justice in the world. As Analysts, we're trained to be resilient and we are equipped with coping mechanisms, we work in a supportive environment and avail of vicarious stress counselling. The vast majority of Internet users don't have this. It can be particularly difficult reading a report from someone who has been clearly emotionally affected by the abuse they unintentionally witnessed, and it's something we strive to mitigate against and prevent, by acting as fast as we can to have CSAM removed at source. This is a global problem, and as such we chase the content to its origins and send notices for removal to service providers in Ireland and across the world daily. We are integral part of a global community of trusted partners and together we form the INHOPE network of hotlines. Our focus is to stop children from being re-victimised while providing quality leads to law enforcement, so that the children in the imagery may be identified and safeguarded. The fact we can also make sure innocent people from anywhere aren't at risk of being exposed to known CSAM further empowers us in our work.

Sean, Hotline.ie Content Analyst

# Snapshot of CSAM hosting patterns





Russia  
558

Columbia  
1

UAE  
1

Iran  
12

Kyrgyzstan  
2

India  
555

China  
10

South Korea  
1

Japan  
4

Taiwan  
2

Hong Kong  
762

Thailand  
47

Vietnam  
36

Malaysia  
224

Singapore  
19

New Zealand  
1

TOR  
Network  
9

14,772  
Total reports

Across  
42  
Countries

## N-light research project



1 of 5 grantees of the End Violence Against Children, Tech Coalition Safe Online Research Fund

In 2021, Hotline.ie partnered with Technological University Dublin (TUDublin) and ISPCC Childline to embark on a research project (N-Light) with the aim to expand knowledge and understanding of online child sexual exploitation and abuse (CSEA) and explore more effective measures to prevent it.

The End Violence Against Children and the Tech Coalition launched the Safe Online Research Fund, together with a call for innovative research

proposals with priority given to research that can help inform the technology Industry's approach to combating online child sexual abuse exploitation and abuse (CSEA).

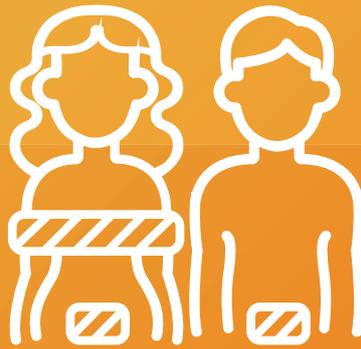
The N-Light Research Project, first of its kind, aims to uncover patterns of online child sexual exploitation through national helpline and hotline analysis of caseloads. The goal of the Project is to advance our understanding of trends in perpetrator behaviour (conduct, contact, content) – including grooming – and debunk strategies and tactics used to lure and coerce children into sexually exploitative acts. We intend to do so by leveraging the wealth of hotline and helpline expertise and by bringing the two strands together, which hasn't been done before for the purpose of research.



Hotline.ie's work to date has focussed on fighting the supply of child sexual abuse images and videos being uploaded and shared on the Internet. We want to play a bigger role in fighting the demand and contributing to effective prevention strategies. We'll be working with other organisations and stakeholders through the next year to explore how we can do this. The team at Hotline.ie is hopeful the N-Light Research Project will play an essential role in facilitating evidence-based actionable outputs. I'm looking forward to sharing our findings and progress in our next annual report.

Ana Niculescu, Chief Executive of Hotline.ie

## Intimate Image Abuse



99%

successful cross-border  
removal rate

## Know the Law

⚠ The non-consensual sharing of intimate images or videos (for short intimate image abuse) is an offence under the Harassment, Harmful Communications and Related Offences Act 2020 (also known as Coco's Law).

**It is illegal to take or share an intimate image of someone without their consent.**

⚠ An intimate image of a person under 18, in certain circumstance, could constitute child sexual abuse material, which is an offence under the Child Trafficking and Pornography Act 1998 as amended by the Criminal Law (Sexual Offences) Act 2017.

## Did you also know?

**Even if a person gives consent** for an intimate image to be taken **it is still an offence** if it is subsequently shared without their consent.

Even if someone shares an intimate image without the person's consent **without the intention to cause harm** it is an offence under the act to do so.

**Digitally altered images** purporting to be of an individual, such as a person's face photoshopped onto another's body, can classify as intimate images abuse under the act.

**"Upskirting"** or **"downblousing"** meaning the taking of photographs without a person's knowledge or consent, either from below their skirt or down their blouse, is an offence under Coco's law.

## What is intimate image abuse?

**The Harassment, Harmful Communications and Related Offences Act 2020 (Coco's Law) defines an intimate image in relation to a person as any visual representation, made by any means including any photographic, film, video or digital representation.**

Examples of intimate imagery that could constitute intimate image abuse (IIA):

- a person, for example, an ex-partner shares an intimate image of you on social media without your consent
- a person digitally alters (photoshops) an image of you with a sexually explicit image and shares it without consent
- a person posting your intimate image/video on an adult website without your consent

In general terms "consent" is when a person agrees or gives unambiguous permission to another person to do something. Consent should be expressed freely, voluntary and informed. In any given situation there should be room for the person consenting to say no and/or to change their mind.

Before Coco's law came into force in February of 2021, the act of sharing an intimate image wasn't an offence on its own.

## Words matter, call it for what it is

Intimate image abuse is sometimes colloquially referred to as "revenge porn", however we strongly urge against the use of this term as it does not adequately capture the very nature and cause of this type of abuse. This term is misleading as it:

- implies the person responsible for sharing the intimate image without the victim's consent is a former partner that may have been wronged – whilst people who share intimate images without consent do so for many reasons and some may not even know the victim;
- implies the victim has done something wrong and deserves "revenge" – but no one deserves to experience this form of abuse;
- liken the images to legal adult pornography in which adults have given expressed, voluntary and informed consent.

Anyone can experience intimate image abuse. IIA is more common than one might think, it impacts people no matter their age, gender, ethnicity, socio-economic background.

If this happens to you, remember that it's not your fault. You are not alone. There are supports available to help you cope with what has happened.

## New Hotline.ie IIA service launched

In September 2021, Hotline.ie launched its secure and confidential IIA web-reporting portal and service, which has been developed in conjunction with the Department of Justice and An Garda Síochána.

Hotline.ie can help in a number of ways, for example:

- with the reporting and removal of the intimate images shared without the person's consent;
- by liaising with An Garda Síochána should the reporter wish to have the matter investigated by the Gardaí;
- by signposting to relevant resources and other support services available in Ireland.
- To learn more please visit our IIA Frequently Asked Questions aimed to provide an overview of key issues and terminology.  
<https://www.hotline.ie/what-to-report/iaa/faq>

Whilst Hotline.ie works in close collaboration with the Gardaí and tech companies, especially our members, the Hotline.ie web-reporting portal is simultaneously distinct and independent of law enforcement reporting channels and any other online service own reporting channels. This is important and relevant, specifically as online material tends to be shared and accessible across all available digital fora.

To further exemplify, if an intimate image has been shared without the person's consent across e.g. three to four different websites and platforms, the person now has the option of submitting one single report to Hotline.ie referencing the four different sources (links) in a comprehensive approach. The alternative would be for the person to try to identify (not always easy or straightforward) reporting channels for each of the three/four different websites and platforms, subsequently submit three/four individual complaints.

Additionally, in assessing IIA reports received through our web-reporting portal, Hotline.ie Analysts have often seen a crossover intermingling with different types of abuse. When the victim is under 18, the imagery may constitute, in certain circumstances, child sexual abuse material or technology facilitated child sexual exploitation, and as such the content in itself becomes illegal and documented evidence of a crime being committed. Hotline.ie has been handling cases of CSAM long before being tasked to tackle IIA and as such our world-class Analysts are equipped and have the know-how to address the matter through appropriate processes, procedures and law enforcement channels. The Hotline.ie IIA service is evolving alongside the law and practice, and as we are drawing from international best practice championed by the eSafety Commissioner in Australia, and the RPHelpline in the UK.



The circumstances in which a person, and in particular a young person, may become a victim of intimate image abuse can vary. However, no one deserves to feel unsafe, lonely, powerless or hopeless...We understand that going through such an experience can cause significant distress and even have long-lasting impact on a person's life and wellbeing. The team at Hotline.ie is honoured to be able to play an active role to break the cycle of abuse, prevent repeat-victimisation, and support those who have been victims of intimate image abuse on their healing journey - their bravery, courage and resilience is nothing less than inspiring.

Ana Niculescu, Chief Executive of Hotline.ie

## Statement of purpose and the IIA dataset

The Hotline.ie IIA service was launched in September 2021, whilst the Annual Report covers the calendar year (January to December 2021). Thus, the main purpose of this Section is to provide a more up to date and accurate snapshot of the uptake of the service, together with the findings and outcomes.

These outcomes are paramount to the team at Hotline.ie, as we strive to empower and support young people and adults alike who have had intimate images shared without their consent online.

The statistics included in this Section refer to the period September 2021 to September-end 2022.

The IIA figures corresponding to January - May 2022 are not included in the overall total number of reports received by Hotline.ie (2021) referenced in the previous Sections of this Annual Report.



\*\* the statistics referenced in this section refer to reports received September 2021 to September 2022. Notably: in most cases a report would contain (lead to) multiple items i.e. images and/or videos.

A report can receive multiple actions predicated on the outcome sought by the reporter and/or specific context, e.g. removal, referral to AGS and signposting.

Since the inception of the service to the end of September 2022, Hotline.ie received 773 reports under IIA suspicion. As a point of reference, the UK helpline for IIA recorded approximately 500 reports in their first year of operation.

Of the 773 IIA reports received, 525 were actionable reports, in other words they contained the necessary information required for our Analysts to locate the imagery online (e.g. active and publicly accessible web location where the images and videos were being shared), to assess it, and subsequently removal could be enacted. For more details, see the adjacent infographic.

The remaining 248 reports were marked as non-actionable. Some related to environments or situations outside the scope/remit of Hotline.ie, such as intimate images sent over encrypted or private communications (e.g. message). In such case probably the only course for removal of the imagery would be its deletion from a personal device such as a mobile phone or laptop, which needless to say it is outside Hotline.ie's means or remit.

When an IIA report has been marked as non-actionable, and where contact details are provided by the person reporting the incident, assistance and signposting to other Irish support services is provided as applicable.

9 in 10 IIA actionable reports resulted in the complete removal of the reported intimate images and videos shared without the person's consent online. This is a noteworthy success particularly as all the material had been hosted outside of Ireland, in jurisdictions where the non-consensual sharing of intimate images and videos would not be illegal. However, this content would not have ordinarily been actioned for removal before Coco's law was enacted in Ireland.

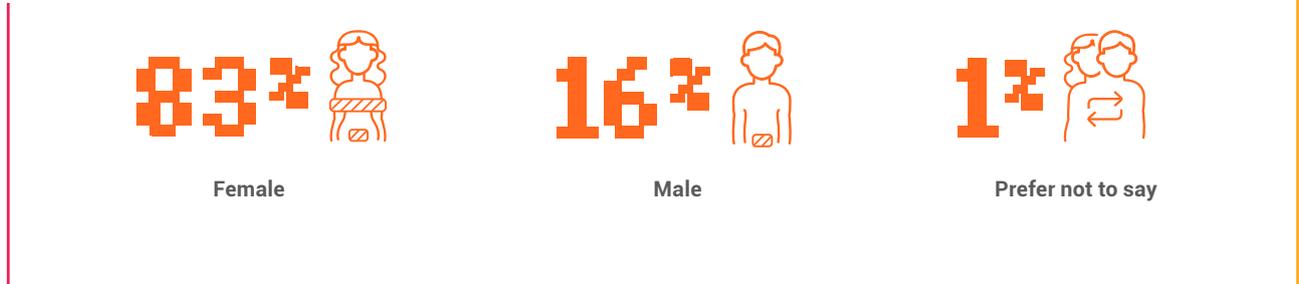
Hotline.ie Analysts will use all reasonable efforts to effect the removal of IIA and a report will only be closed when all feasible options are exhausted. The main reasons for a report to be closed are: (i) the online service provider (OSP) is completely unresponsive, it may be that in the country the website is hosted an equivalent law doesn't exist and as such the OSP in the said country do not feel they must comply with Irish law and remove the content; or (ii) the reporter themselves provided non-functioning contact details.

In the event that the content cannot be removed, due to aforementioned reasoning, action is taken to ensure that search engines delist search results relating to the IIA in question. This action will significantly reduce the chances of someone being able to locate the image or people viewing it through general searches.

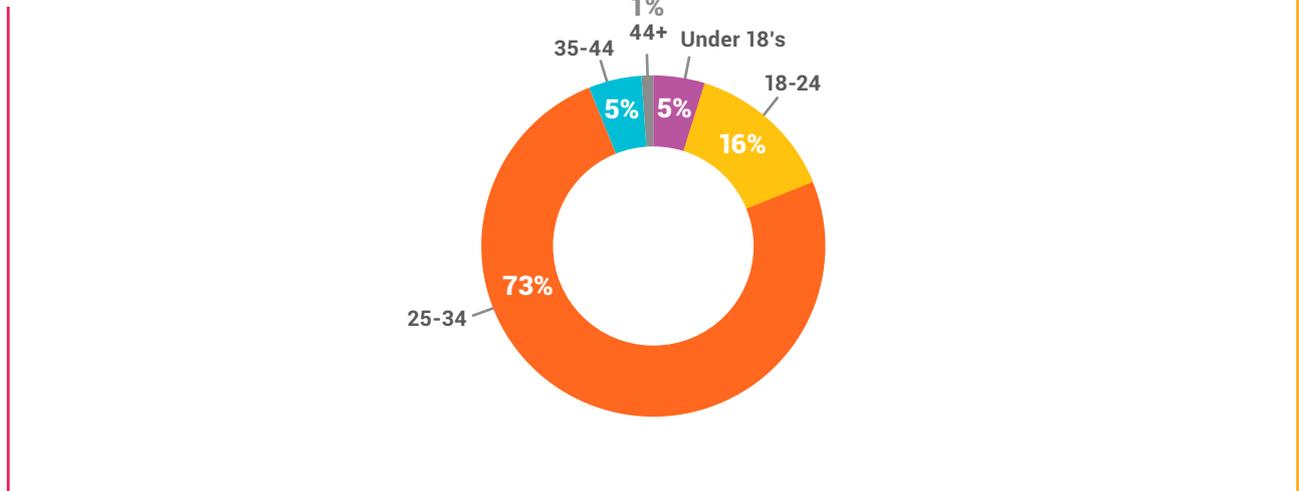
Of the 773 IIA reports received, 525 were actionable reports, in other words they contained the necessary information required for our Analysts to locate the imagery online.

# The people who have suffered from IIA

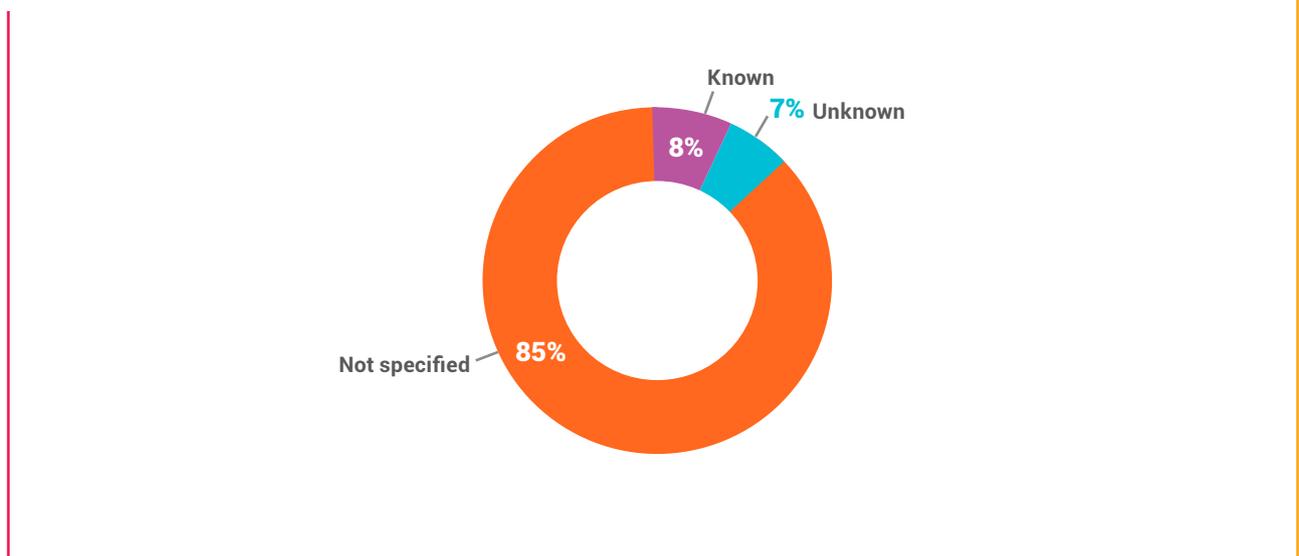
## Gender breakdown



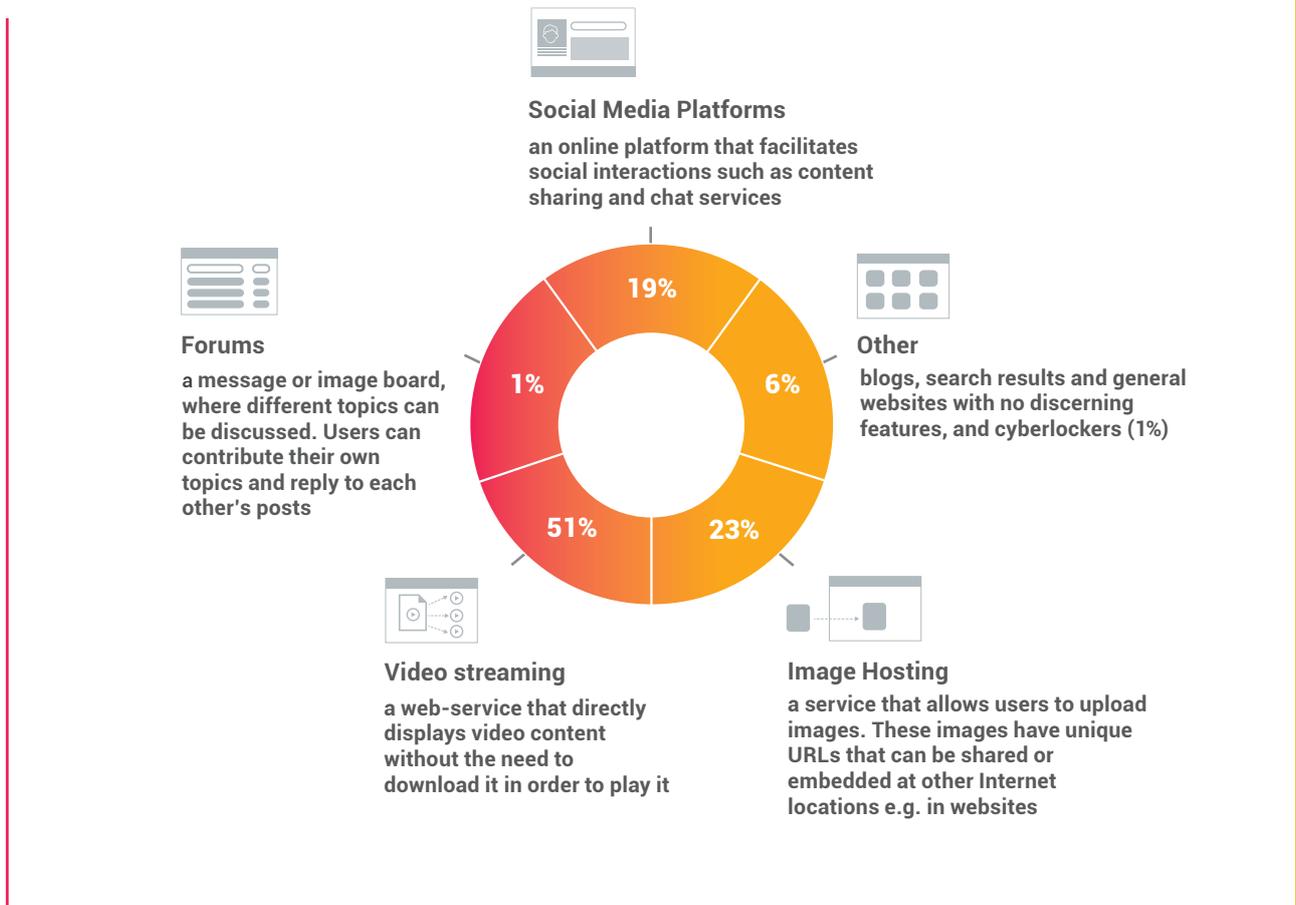
## Age breakdown



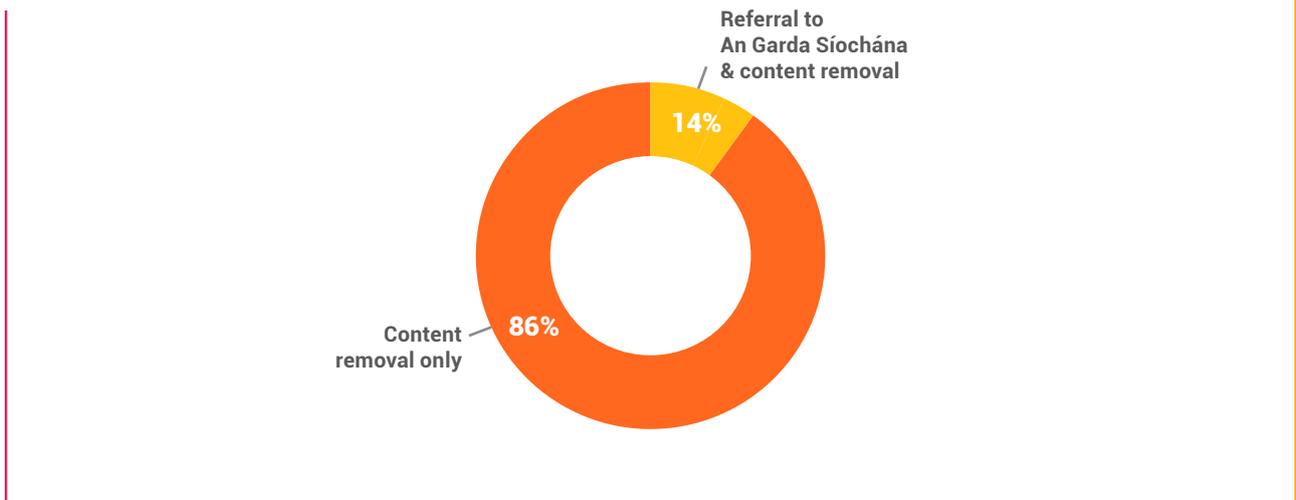
## IIA perpetrator



## IIA site types - where the imagery was found



## Outcome sought by the reporter



Only 1 in 7 reporters indicated they wished to have the matter referred to An Garda Síochána for law enforcement investigations. The vast majority opted for content removal only. The sample size is too granular at this juncture to allow for further

interpretation of these findings. Reports of intimate image abuse involve complex social dynamics which results in no two reports being the same.

## Hotline.ie Analyst testimonial



One of the most troubling types of reports relate to sexual coercion or “webcam blackmail” also referred to as “sextortion”.

Most of these appear to follow a pattern, namely an individual who has obtained or claims to have obtained a person’s intimate imagery, threatening to share it online unless the victim pays a certain fee or provides more intimate images.

Based on preliminary analysis of the reports received to date, men seem to be more at risk of falling victim to blackmail (sextortion). The victims have reportedly been approached over social media, through dating apps or on video chat services.

As a common occurrence a man is contacted by an unknown user masquerading as a woman, who then engages in sexualised conversation and initiates an exchange of intimate images or videos. As soon as an image or video is sent, the unknown user will threaten the victim with sharing the imagery to their friends, family, and social media contacts.

The victims have often time indicated a cross-platform journey, with initial contact being made on one platform, thereafter the conversation being moved to direct messaging or another platform, the sharing of the imagery on yet another, and payment discussions carried out or involving another medium.

In many cases these are sophisticated scams, which can take over a longer period of time, and it only takes one moment of vulnerability to fall victim to one. Even the comfort of seeing someone on a video call cannot provide guarantees, there are advanced video simulations being used which can visually adapt to a conversation as it unfolds.

Understandably going through such a situation can be extremely distressing, and the urge to pay in order to make it go away can be strong. It’s important to know, the threat to share intimate imagery without the person’s consent is an offence under the Harassment, Harmful Communications and Related Offences Act 2020. If the perpetrator of the crime is abroad there may be limited things the police can do, however it’s important to report these types of crime.

### **If you are being blackmailed:**

- **do not pay any money or meet demands they may request such as sharing any imagery;**
- **stop all contact with the blackmailer;**
- **make all your social media private to the extent that strangers cannot contact you;**
- **if you can, take screenshots of the messages where the blackmail threats were made, bank details they shared with you and any other relevant communication;**
- **block the user;**
- **report the accounts used to blackmail you to the relevant platform;**
- **report it directly to your local Garda station.**

The goal would be to make yourself as difficult as possible to contact or appear completely resistant to their attempts to extort you. The people behind these scams appear to operate at scale and it is likely they will lose interest and move onto their next victim when they realise no money will be paid and they have no way of contacting you with more threats. That being said, there is never a guarantee that they won’t share the images regardless, but if they are shared then it is important to report it to us and the Gardaí as soon as possible. Last but not least, make sure you reach out for support to help you cope with what has happened.

## Signposting

**Anyone can experience intimate image abuse. If this happens to you, remember that it's not your fault and you are not alone!**

Intimate image abuse can have significant consequences upon your wellbeing. Fortunately, there are support services available in Ireland to help you cope with what has happened.

To name a few:



**Women's Aid** offers support to women affected by abuse, and advocates for justice and social change. It operates a 24 /7 national freephone confidential helpline. The helpline has fully accredited and specialised trained staff.

**A telephone interpretation service facility covering 170 languages is also available.**

Women's Aid also offers an instant message support service, in addition to one-to-one support.

**Website:** [www.womensaid.ie](http://www.womensaid.ie)  
**Freephone:** 1800 341 900  
**Email:** [helpline@womensaid.ie](mailto:helpline@womensaid.ie)



**Mens Aid Ireland** is the only dedicated national service supporting men and their families experiencing domestic violence including coercive control. Men's Aid also offer counselling support to help you navigate through difficult situations. They have professionally trained counsellors and therapists who specialise in domestic violence trauma and family issues.

**Website:** [www.mensaid.ie](http://www.mensaid.ie)  
**Confidential national support line:** 01 5543811  
**Email:** [hello@mensaid.ie](mailto:hello@mensaid.ie)



**Rape Crisis Network Ireland** is a specialist information and resource Centre on rape and sexual violence. RCNI have dedicated expert and specialist resources to support a wide programme of work for justice for victims of sexual violence.

**Website:** [www.rcni.ie](http://www.rcni.ie)  
**Crisis Help:** [www.rapecrisishelp.ie](http://www.rapecrisishelp.ie)



**Safe Ireland** offers a helpline, one-to-one support, court accompaniment, advocacy, outreach, and support groups. It collaborates with over 38 specialist frontline domestic violence services throughout Ireland. Safe Ireland provides safety information together with information on where to find help and type of supports available.

**Website:** [www.safeireland.ie](http://www.safeireland.ie)  
**Telephone:** +353 90 6479078  
**Email:** [info@safeireland.ie](mailto:info@safeireland.ie)



**Crime Victims Helpline** is the national support service for victims of crime in Ireland. They listen with empathy and without judgement, and by providing time and space for you to talk about your experience in confidence. The Crime Victims Helpline can provide information about the criminal justice system, about your rights and tailored signposting to local or specialist victim support services.

**Website:** [www.crimevictimshelpline.ie](http://www.crimevictimshelpline.ie)  
**Phone:** 116 006 **Text:** 085 1337711  
**Email:** [info@crimevictimshelpline.ie](mailto:info@crimevictimshelpline.ie)

## Racism & Xenophobia



26%

of the reports related to  
hate-speech not currently  
illegal under Irish law

## Findings & Insights

**Since 2016, there have been 584 reports of suspected racism and xenophobia reported to Hotline.ie, with 112 of them being reported in 2021.**

Hotline.ie acts to remove material relating to racism and xenophobia that is an offence to distribute under the Prohibition of Incitement to Hatred Act, 1989. According to the Act, it is an offence to publish or distribute any material that is likely to stir up hatred against a group of people on the grounds of race, colour, nationality, religion, ethnic or national origins, membership of the traveling community or sexual orientation. While this criminalises hate speech in Irish law, the threshold that is required to be met for an offence is very high. Published content has to be threatening, abusive or insulting and intended or likely to stir up hatred. There have only been fifty convictions under this law since 1989.

When assessing a report submitted under racism and xenophobia submission, an Analyst must first identify if the material meets the aforementioned criteria. While threatening or abusive material is relatively simple to identify, the concept of hatred is open to interpretation. Thus, only a small proportion of reported material is classified as inciting hatred against protected groups, while a higher proportion relates to general online hate speech. In cases where an offence under the Prohibition of Incitement to Hatred Act, 1989 is determined not to have occurred, due to the threshold not being met, online service providers are contacted and made aware of the material and asked to consider its removal whereas the material may be in breach of the Terms of Service or Community Guidelines, for example. When the reported material has been assessed as inciting hatred against a protected group, the online service provider is subsequently notified and asked to remove the material, and the report is simultaneously referred to the appropriate An Garda Síochána division.

Of the 112 reports received by Hotline.ie under racism and xenophobia suspicion in 2021, 7% were assessed as inciting hatred against protected groups with 26% related to online hate speech. There were two reports of death threats made against members of protected groups. 1 in 3 reports related to social media, with the majority of reports being related to other websites and a smaller sample of forums.

While threatening or abusive material is relatively simple to identify, the concept of hatred on the other hand is far more complex.

Since 2016, only 20% of the reports related to racism and xenophobia have been found to be on social media. Hotline.ie Analysts have noted that posts or comments reported on these sites are much more likely to have been removed before assessment, than posts made on less mainstream sites. The websites reported to Hotline.ie, where found to be predominately hosted in the USA, and as such protected under freedom of speech, which in turn means that effecting the removal of the material on these sites can face significant barriers and proves to be quite difficult.

The upcoming Criminal Justice (Hate Crime) Bill 2021 will repeal and replace the Prohibition of Incitement to Hatred Act, 1989. The Bill amends incitement to hatred by providing a definition of 'hatred', adding new protected characteristics such as gender and disability, extending it to individuals rather than just groups, and makes incitement to hatred based on a perceived association with a protected characteristic an offence. The final form of the Bill is yet to be published, as of time of writing, but there is promise; amendments so far would bring clarity that would further assist Hotline.ie Analysts in their work and enable them to action wider range of problematic online material. The full Bill is aimed to be published and enacted by end of 2022.

## Resources



### Responding to Racism Guide (ENAR Ireland, 2019)

This guide provides you with information about how and where to report racist incidents, including racist discrimination, racist crimes and hate speech online, as well as how to go about finding redress and how to use existing legislation to address racism.



### Crime Victims Helpline Ireland

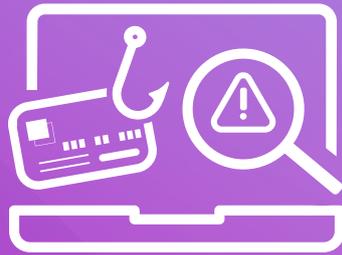
**Freephone:** 116006

**Text:** 085 133 7711

You can also request a call back through their webform

The Crime Victims Helpline is a listening and support service for victims of crime in Ireland. The Helpline also provides information about the criminal justice system, your rights, and signposting to local or specialist support services and other resources in the community.

## Financial Scams



45

websites attempting to  
scam Irish residents removed

## Statistics & findings

**In 2021, we received 619 reports quoting financial scam suspicion; the highest number of reports of this nature made in a calendar year. It represents a 56% increase from last year's 398 reports. There has been a steady increase over the previous five years, with a total of 2,237 suspected financial scams reported to Hotline.ie since 2016.**

Of the 619, only two were found to be hosted with online service providers in Ireland, and they were not members of Hotline.ie.

7% of suspected financial scams were assessed to be aimed at deceiving people residing in Ireland and as such actioned for removal. Of these scams, the vast majority were phishing websites or unauthorised or fake loan websites.

Phishing is the process by which a scammer attempts to trick a person into thinking that they are on a legitimate website belonging to a trusted business in order to steal personal details (e.g. email addresses, account passwords, bank details, etc.). Any aspect that can be used to impersonate someone or gain access to their financial information to defraud them.

These fake websites can be nearly identical to the ones they are purporting to be. Hotline.ie Analysts have noted that some of these websites will even blend in page links back to the actual organisation's website and display social media posts from the business to make the replica website appear as legitimate as possible. A technique to spot a phishing website is to check the URL of the website, as this cannot be duplicated. The URL may contain similar elements, such as a variation on the business name, but they will almost always deviate from the real (actual) business URL. In some cases, the URL will often

have added numbers or words on to the domain name, whilst the ending such as ".com" or ".ie" might also be replaced with a more obscure one. For example, realbusiness.com might become "realbusiness123.com" or "realbusiness.fake". While these phishing websites can appear to be obvious scams if one was to analyse them in isolation, the means by which a person is contacted or tricked on to these websites plays an essential part in making them appear "authentic".

The phishing websites reported to Hotline.ie in recent years had been predominately delivered through email or popup ads. However, in 2021 Hotline.ie Analysts noted a particular rise in cases of what has become known as "smishing". Smishing occurs when a person is contacted via text from what appears to be a trusted organisation, most commonly a bank. The text message will seek an urgent response and provide a URL link to a fake website such as the ones described above, usually asking for you to log in to your account.

Another version of this scam that has been reported is where a person will receive a text message claiming to be from a delivery service where the person is asked to access a website and pay a delivery fee for the item. In certain cases this is to steal credit card details, other times the person will unknowingly have signed on to a monthly subscription.

Smishing can be particularly deceptive as the text messages are sent to one's personal mobile number and are spoofed to appear as coming from a reputable organisation, the messages can even appear tagged on to messages received previously from the real (legitimate) organisation.

While the scam may be initialised through text, once there is a URL provided to access, then these web links can be reported to Hotline.ie. As part of the assessment process, the website's hosting location will be checked to see if it is hosted in Ireland, the nature of the website is also gauged to determine whether it is purporting to be an Irish organisation or displaying Irish contact information/details. When Hotline.ie Analysts classify the content as financial scam with an Irish context, a referral would be generated by the Analyst and forwarded to the Garda National Economic Crime Bureau (GNECB). The appropriate online service provider will then be contacted to request that the phishing website be taken down. The removal of these type of websites is key to combat these scams and reduce the level of harm, particularly as the link in the text message will only work if there is a website it can get to.

Hotline.ie would urge anyone who has received a text message (as described above) to report the URL or the contents of the message through its web reporting portal [hotline.ie/report](https://www.hotline.ie/report) so that it can be actioned for removal. The faster the website is taken down the lesser the opportunity for an unsuspecting person to be scammed.

Noteworthy, a significant amount of fake loan websites was also reported in 2021. These websites offered interest-free or quick loans, appearing to target people residing in Ireland that might be in difficult financial situations. Commonly, these websites would seek personal details from an individual "applying" and subsequently request a small service fee before "providing" the loan.

The provision of financial services is regulated by the Central Bank of Ireland. If a service is not present on their register, then they could potentially be committing an offence under the Irish law. If such a loan site is reported to Hotline.ie, the Central Bank is contacted so they can investigate and publish a notice to warn people residing in Ireland.

Phishing is the process by which a scammer attempts to trick a person into thinking that they are on a legitimate website belonging to a trusted business in order to steal personal details.

## Partnerships



There is no question that child protection in the digital world is one of the most pressing societal challenges of our time. At Hotline.ie we are acutely aware of the need to remain agile, future-focused and collaborate strategically in national, European, and even global opportunities, to achieve tangible impact

Ana Niculescu, Hotline.ie Chief Executive

# Building partnerships for tangible impact



## Working in partnership for good

**Hotline.ie works collaboratively, in partnership with a diverse mix of NGOs, charities, law enforcement, experts, researchers and academia, tech companies, and policymakers – to name a few. We believe national, European and global coordinated effort is key to effect a paradigm shift and effectively combat transnational crimes against children such as child sexual abuse and exploitation.**

Hotline.ie's work is supported and co-funded by our Members (tech companies) and by the European Commission through grant aid funding.

We continuously strive to increase public awareness of our reporting function, so that members of the public know what to report and what to do should they accidentally come across illegal content online.

In order to effectively remove illegal content from the Internet, especially child sexual abuse and exploitation and intimate image abuse, Hotline.ie works at national level, in conjunction with its Members and law enforcement.

Hotline.ie is a founder member of INHOPE, the International Association of Internet Hotlines. Today, INHOPE brings together over 50 hotlines in 46 countries worldwide (all EU Member States, the UK, Russia, South Africa, North & South America, Asia, Australia and New Zealand), united in the mission of eliminating child sexual abuse material online.

INHOPE's raison d'être and mission is to support and enhance the work of member hotlines. INHOPE and INTERPOL hold regular joint content assessment training sessions for hotline Analysts

to ensure consistency of the assessment process on all levels. To that end, all Hotline.ie Analysts have been certified, subsequent to the completion of INHOPE/INTERPOL training sessions.

In addition, member hotlines have access to an extensive programme of webinars delivered by experts in topics relevant to our work. INHOPE also provides a forum where we can exchange information and experience on matters such as health and safety for hotline staff, standardised reporting of statistics, emerging operational challenges, to name a few. We actively participate in INHOPE Task Groups and share our expertise, whilst drawing from the collective multi-disciplinary expertise within the INHOPE network.

In 2014, INHOPE launched the Quality Assurance Programme (QAP) with the view of ensuring enhanced compliance and an optimal standard of hotline operation by existing and new members alike. Since the inception of the INHOPE QAP, Hotline.ie has been assessed twice by independent experts and each time found to be compliant and exceeding the minimum standard requirements and has been awarded the INHOPE Quality Assurance Certification for excellent hotline service and standard of operation.

When Hotline.ie Analysts classify content as illegal under Irish law and trace the online origin of the content in question as being hosted in a country with an INHOPE hotline presence, our Analysts alert the relevant hotline through the EU-funded secure international CSAM report management system (ICCAM). If there is no hotline presence in the hosting country, the CSAM report will be subsequently dealt with through appropriate law enforcement channels.

Tackling online child sexual abuse material requires a multipronged approach. It is crucial to effect rapid removal of CSAM from the Internet, whilst ensuring the children in the images may be

identified and safeguarded, perpetrators identified and brought to justice. That is why working in partnership with law enforcement is of utmost importance.

Our highly skilled Analysts sift through thousands of public reports leading to hundreds of thousands of images and videos to identify quality leads. The content classified as most probably illegal "child pornography" under Irish law is notified to the relevant unit of the Garda National Protective Services Bureau as per agreed procedures. We used the term "probably illegal" as only a court of law can make a judgement as to whether something is definitively illegal under the law. As such, Hotline.ie's triage function should not be misconstrued as criminal investigation which together with evidence gathering to support criminal proceedings is a matter for law enforcement alone.

Hotline.ie is also integral part of the Irish Safer Internet Centre (SIC). The Irish SIC is a unique partnership bringing together ISPCC, Webwise Ireland, Hotline.ie and NPCP. The partner organisations work together to identify emerging online threats, take direct action against them through the delivery of evidence-based services, resources and programmes, whilst providing support to children, young people, parents, teachers, with an end-to-end approach.

The Irish SIC provides:

1. Ireland's primary national channel for the public to securely and confidentially report suspected illegal content online see [www.hotline.ie](http://www.hotline.ie);
2. 24/7 free confidential listening services for all children up to the age of 18 in Ireland, delivered by ISPCC [www.childline.ie](http://www.childline.ie);
3. free and confidential helpline service for parents and guardians, delivered by the NPCP; they also provide online and face to face training courses for parents – see [www.npc.ie](http://www.npc.ie); and
4. Internet Safety Awareness Centre, Webwise, who develop youth oriented awareness raising resources and training programmes that promote digital citizenship and address topics such as online wellbeing, cyber-bullying and much more. Webwise also organise and coordinate the annual Irish Safer Internet Day events - see [www.webwise.ie](http://www.webwise.ie).

We would like to thank all those who have supported Hotline.ie's work and our mission in 2021. Supports come in many ways, some of our Members provide addition in-kind support over their membership fees, and to that end we would like to especially acknowledge and thank Blacknight Solutions; and we receive critical Grant aid support from the European Commission through the Connecting Europe Facility – Safer Internet Programme.

As a not-for-profit, our resources are finite and we encourage others to play their part whether by reporting suspected illegal content online to Hotline.ie, funding us, or collaborating on the development of best practices, technology, and research. Your support contributes to tangible change, helps us remain agile and ultimately enables us to enhance our impact for the protection of countless children and people within Ireland and even abroad. Our work continues every day.

## Our Members

27 companies, including some of the giants of the Internet world through to smaller online service providers operating in Ireland, chose to actively support Hotline.ie in our mission to tackle the distribution and proliferation of child sexual abuse and exploitation online.



# Glossary of terms

**An Garda Síochána:** Ireland's National Police Service.

**Child sexual abuse images/videos/imagery/content/material:** any representation that shows a person who is or is depicted as being a child and who is engaged in or is being depicted as being engaged in real or simulated sexually explicit activity. We use the term "child sexual abuse" material/imagery to reflect the very nature and gravity of the content that we deal with and challenge any notion that such acts may have been carried out pursuant to the "consent" of the child.

**Computer-generated or "virtual" child sexual abuse:** in the context of child sexual abuse and exploitation this refers to wholly or partly drawn, artificially or digitally created and/or altered sexualised images of children, and it is illegal under Irish law. This can include, for example, cartoons, drawings, computer-generated animations or imagery, pseudo-photographs (e.g., where the computer-generated image is almost indistinguishable from that of a real living child), stories, etc.

**Child-Grooming:** in the context of child sexual abuse and exploitation, "grooming" is the short term for the solicitation of children for sexual purposes. It refers to the process of establishing/ building a relationship with a child, sometimes by using digital technologies, with the view to lower their inhibitions, manipulate, and sexually exploit and/or abuse them.

**Child "self-generated" or "self-produced" sexual material:** term used to refer to sexually explicit imagery or videos taken by children and/or adolescents (under 18 y.o.), and primarily used as a descriptive term to convey how the image came to be. In some cases, such content may be produced voluntarily and initially shared without malicious intent as part of developmentally appropriate exchange between adolescents. However, there are situations in which harm is caused e.g., when a child or adolescent is coerced into producing such content; when the imagery is scraped by "collectors" and misappropriated, etc.

**Commercial CSAM:** child sexual abuse material that in the professional opinion of the Hotline.ie Content Analyst has been produced, distributed, or intended for the purpose of financial gain - whether directly through membership fees, traditional payment methods and cryptocurrencies or indirectly via digital advertising networks or other methods.

**Content already removed\*** classification is assigned when the reported webpage clearly states that the content was removed. This may occur when, for example, the content owner no longer wishes to make it available and has deleted it; the content was actioned in the meantime through other means; or it was in breach of the service provider/platform terms & conditions. In this event, our Analysts have no way of knowing beyond any reasonable doubt whether the content would have been potentially illegal under the Irish law, and as such the only classification that can be assigned is "content already removed".

**Dark web or dark net:** is the hidden part of the Internet, namely the part of the web whose contents are not indexed by standard web search engines, and which requires special software, configurations or authorisation to access. It can be accessed using Tor which is anonymity software that makes it difficult to trace users' online activity.

**End-destination service:** is a digital service or platform where CSAM is being hosted or accessible at e.g., a video streaming website, or image host, etc.

**End to end encryption (E2EE):** a method of securing online communications, wherein the content of each message is visible only to the sender and recipient. Broadly speaking encrypted data is only "readable" by those with decryption keys. E2EE prevents unintended users, including third parties, from reading or modifying data when only the intended reader(s) should have this access and ability.

**Gateway service:** a digital service or platform or website that (re) directs, leads, or links to CSAM e.g., a forum post sharing a link to a third-party website.

**Not accessible\*** classification assigned when our Analysts cannot access the online content that is being referred e.g., the domain is not found to exist, if a website or cyberlocker requires payment to access, etc.

**Not found\*** classification is recorded when, for example, a 404 error "page not found" is returned.

**Notice and Takedown (NTD):** is the process through which CSAM is referred by Hotline.ie for removal from the Internet by the tech companies who may be hosting or providing access to the illegal content in question.

**Other not-illegal\*** classification is applied when the content does not breach Irish law and does not fall into one of the common Hotline.ie classifications; for example reports pointing to news articles, videos of children arguing on the playground, etc.

**Repeat-victimisation or re-victimisation:** is what happens to a victim when their abuse is recorded e.g. images/videos, uploaded and shared online. Each repeat viewing and sharing of the content constitutes a perpetuated violation of the victim's rights and prolonged suffering. The prevention of re-victimisation is at the heart of Hotline.ie's work. With each illegal reference (website, image, video, etc.) that we remove from the Internet, there is one less instance of re-victimisation.

**Report:** in the context of Hotline.ie work, the term is used to refer to a "single" publicly sourced reference of suspected illegal content online (e.g., a website) received by Hotline.ie. In most cases this "single" reference may contain, display, or lead to hundreds of items (e.g., images, videos, lists of hyperlinks to other webpages, etc.).

**URL:** an acronym for "Uniform Resource Locator". A URL is the specific Internet location where a file is saved. For example, the URL of the Hotline.ie Code of Practice is: <https://www.hotline.ie/library/hotlineie-code-of-practice-2020.pdf>

**Query:** in certain cases, queries submitted to Hotline.ie may progress to a full report. Members of the public who may wish to submit a query or receive a report acknowledgement and a response should ensure to include an email address with their report. Any personal data relating to a non-anonymous report will be deleted within ninety days from completion of the assessment of the report. For more details, please read our Privacy Statement available on [www.hotline.ie](http://www.hotline.ie)

**Webpage:** a document which can be viewed using a web browser. A single webpage can hold many images, text, videos, or (hyper) links: where many websites will have several webpages.

**Website:** it is a set of related webpages typically served from a single web domain. Most websites consist of several webpages.



Hotline.ie is here to help. Break the cycle of abuse. One report at a time.

[www.hotline.ie/report](http://www.hotline.ie/report)