



## **Internet Watch Foundation (IWF) - response to the European Commission's consultation on Safer Internet and online technologies for children**

### **1 Introduction**

On 13 April 2007, the European Commission launched a public consultation to identify the most effective ways of making the online environment and communication technologies safe for users, in particular children.

The current Safer Internet plus programme will end in 2008 and the Commission is conducting this consultation in order to create a basis for deciding whether to propose a follow-up programme from 2009 to 2013 and how best to address issues relating to online technologies in the future.

### **2 About the Internet Watch Foundation (IWF)**

The IWF is the only authorised non statutory organisation in the UK operating an internet 'Hotline' for the public and IT professionals to report their exposure to potentially illegal content online.

Our aim is to minimise the availability of potentially illegal internet content, specifically:

- child abuse images hosted anywhere in the world
- criminally obscene content hosted in the UK
- incitement to racial hatred content hosted in the UK

We work in partnership with police and UK Government departments such as the Home Office and the Department of Trade and Industry to influence initiatives and programmes developed to combat online abuse. This dialogue goes beyond the UK and Europe, to ensure greater awareness of global issues and responsibilities.

We are funded by the EU and the online industry including internet service providers, mobile operators and manufacturers, content service providers and telecommunications and software companies, as well blue-chip and other organisations who support the IWF for CSR reasons.

Through the hotline reporting system, we help ISPs to combat abuse of their services through a 'notice and take-down' service by alerting them to any potentially illegal content on their systems and simultaneously alerting the police to investigate the publisher.

We also provide a comprehensive list of websites containing child abuse content for organisations such as ISPs, mobile network operators, software companies and search engines to block access to potentially illegal child abuse images and a list of newsgroups which we regularly contain or advertise child abuse content.



### **3 IWF response to the European Commission's consultation on Safer Internet and online technologies for children**

- IWF has responded to the questions in questionnaire 1 only – fighting illegal content - **see attached appendix 1.**

### **4 Contact information**

For further information please contact:

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## Appendix 1

### Questionnaire 1 – Fighting illegal content

#### The IWF response to questionnaire 1 - Fighting illegal content

1.1 *In your opinion, is there a need beyond the year 2008 to pro-actively fight against illegal content?*

Yes, there is a need to continue to pro-actively fight against illegal content.

1.2 *If so, please give indications on what kinds of illegal content/material should be dealt with.*

The IWF's remit includes the following content:

- child abuse images hosted anywhere in the world
- criminally obscene content hosted in the UK
- incitement to racial hatred content hosted in the UK

It is critical that there is a continued worldwide effort to pro-actively combat potentially illegal content, especially child abuse content.

The key to success must be a collaborative international effort. The issues transcend national boundaries and the EU is clearly best placed to drive the European response forward.

1.3 *Which should be the means of fighting the production and distribution of illegal content, in particular child sexual abuse material, and what stakeholders should take initiatives (industry, governments, NGOs, financial institutions etc.)? Please suggest ways in which the different stakeholders can contribute in fighting against production and online distribution of illegal content.*

The UK has an effective multi-agency partnership with the UK-based internet industry, government departments and law enforcement agencies. In that partnership, clear roles and responsibilities are defined resulting in an effective self-regulatory model based on a voluntary notice and takedown code of practice and mutual trust.

The key to success must be a collaborative international effort. The issues transcend national boundaries and the EU is clearly best placed to drive the European response forward.

The concept of an EU child abuse URL database project needs to be realised to facilitate more effective targeting of EU resources. It would also enable the EU to develop an improved understanding of the extent, spread and trends in potentially illegal content. It is vital that the EU is aware of the scale of potentially illegal content in order to target resources and respond to trends. As a by-product, the database could also be used to supply data to European service providers who voluntarily wished to filter child abuse material to protect consumers



Consideration should be given to removing domain names that are clearly linked to child abuse material. Nominet, the .uk domain name registry, works in partnership with IWF to minimise the risk of any domain name implying that child abuse images may be available. Nominet has also been active in trying to ensure that registration details are accurate. However, internationally, evidence appears to suggest that some of these types of domain names are registered with false information. Where possible domain name registries should adopt the good practice and partnership working that Nominet provides in the UK.

- 1.4 *A central element of the fight against illegal content for the Safer Internet plus Programme has been to support an international network of civilian hotlines where the public can report illegal content, should they chance upon it online. In your opinion, is this the most appropriate way of dealing with illegal content beyond 2008? How could their cooperation with law enforcement agencies be strengthened?*

To be effective across the EU, the network of hotlines and other initiatives need high level political support and resourcing.

The UK government chairs a multi-agency Internet Task Force which brings together a whole range of stakeholders who have a collective ambition to make the internet a safer place for children to use. This model is seen as good practice and might be considered as a worthwhile model to replicate in an intense effort to tackle the wider problems of potentially illegal online content.

The loss or reduction of EU funding for hotlines could cause financial difficulties for a significant proportion of the European network. The potential disappearance of hotlines due to lack of funding could result in parts of the EU being vulnerable to criminal exploitation and the hosting of potentially illegal content

At a time when the number of internet users is growing exponentially in Europe and beyond, there can be no better reason to support the network of hotlines.

The network of hotlines provides important local knowledge and contacts to assist in an international response to the tracing and more efficient removal of potentially illegal content. As a consequence of their special knowledge and relationships, within their nation states, the network of hotlines is a reliable, trusted and credible source of information.

Hotlines provide a reporting point for the public which can allow closure following their exposure to potentially illegal content. Civilian hotlines allow a degree of anonymity with their distance from law enforcement – there may be some public reticence about reporting to police hotlines.

The network of international civilian hotlines can reduce the demands on national police agencies and prevent them from being inundated with reports of content which is hosted outside their jurisdiction.



- 1.5 *How can other organisations support national/local and international law enforcement agencies in dealing with the production and online distribution of illegal content?*

The UK has an effective multi-agency partnership with the UK-based internet industry, government departments and law enforcement agencies. In that partnership, clear roles and responsibilities are defined.

- 1.6 *The internet has a global dimension: illegal content can be produced in one country, distributed from a second, and accessed/downloaded in many countries across the world. Please specify which actions should be taken internationally. Are there specific countries which should be focussed on?*

IWF refers the EU to the statistics in our Annual Report 2006, which gives a breakdown of where potentially illegal child abuse content in processed reports appears to be hosted. The figures for 2006 indicate that 54.3% appears to be hosted in the US and 28.2% in Russia.

- 1.7 *Research and development of efficient technological tools (filtering systems, image recognition etc) can contribute to reducing online distribution and indirectly the production of illegal content. Which are the subjects which should be addressed when supporting the development of technologies?*

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- 1.8 *Analysis of psychological effects of victims and studies of how offenders use the Internet to distribute the evidence of the sexual abuse of children can also contribute to the fight against illegal online content. Which are the subjects which should be addressed in these areas when conducting research?*

- 1.9 *The legal situation concerning online distribution of illegal content and indeed the definitions of what is illegal differ across the EU Member States. Which are the issues which should be addressed when harmonising legal provisions across Member States?*