
Fighting to free the world
of CSAM.

Learn more and get involved:
[Inhope.org](https://www.inhope.org)



**Guidelines on best practice
in collaboration
between Hotlines and LEAs**

Guidelines on best practice in collaboration between Hotlines and National Law Enforcement

Each INHOPE hotline should have a collaborative relationship with the National Law Enforcement Agency (hereinafter national LEA) in order to legally and effectively process child sexual abuse material online (hereinafter CSAM), received from the public. For this purpose, it is essential that hotlines establish a long-lasting cooperation with their national LEA. Hotlines should take into consideration that they can most effectively contribute to the fight against CSAM only in close cooperation with LEAs and by providing intelligence to the national LEA so they can identify and safeguard victims.

The purpose of this document is to provide hotlines with non-binding guidelines on how to establish, facilitate and maintain collaboration with their national LEA. These guidelines are based on recommendations, experiences and practices of five INHOPE member hotlines (DE, EE, GR, LT and SE). It is important to keep in mind that this document serves as a guideline and does not contain any mandatory rules that must be followed by member hotlines. Each hotline should have its own internal guidelines in accordance with national law and any agreements with the relevant LEA.



Funded by the
European Union

Funded by the European Union. Views and opinions expressed are however those of the author(s) only and do not necessarily reflect those of the European Union or European Education and Culture Executive Agency. Neither the European Union nor the European Education and Culture Executive Agency can be held responsible for them.

Guidelines

Establishing cooperation

- **Explain to LEA the role of the hotline and benefits of cooperation**

Role

INHOPE Member Hotlines offer the public a way to anonymously report online content that they suspect to be CSAM. The objective is to provide individuals who wish to stay anonymous and are for some reason discouraged or reluctant to contact law enforcement directly, the possibility to report the suspected illegal material while staying anonymous.

The Hotline will ensure that the material is analysed by trained analysts. Hotline analysts are trained by INHOPE, INTERPOL and national law enforcement agencies. If the content is classified as illegal, then the hosting location of that content is traced. When the hosting is in the same country, the hotline analyst will report it to the national LEA and to the relevant Hosting Provider in the country (if agreed with the LEA). If the content is hosted elsewhere, the report will be instantly forwarded via INHOPE's secure platform ICCAM¹ to the hotline in the hosting country to ensure that the content can be 'taken down' as quickly as possible.

Benefits

The benefit for the LEA is that more people are willing to report illegal material as there are more options to report. Moreover, public reporting will not only be limited to the territory of the hosting country but to every country where an INHOPE hotline has been established. INHOPE has hotlines in more than 45 countries which means that there is a significantly larger public platform to report on the crime committed in the hosting country. CSAM is a truly transnational crime and therefore it can be effectively tackled only through international cooperation.

Furthermore, hotlines filter public reports for law enforcement and forward only the relevant reports that contain illegal material. It is important to note that considerable number of the reports received by the public are not illegal. This means that hotlines filter out reports, which gives LEAs more time and resource to spend on the actual illegal material by conducting investigations and thereby safeguard victims faster.

Additionally, hotlines can also support LEAs through Notice and Takedown order. A Notice and Takedown order, commonly referred to as NTD, is a procedure for asking Hosting Provider or search engine to immediately remove or disable access to illegal, irrelevant or outdated information hosted on their services.² This also saves the valuable law enforcement time and resources to focus on identifying the victim and the predator.

¹ ICCAM servers are hosted at Interpol's headquarters, Lyon, France.

² Read more about Notice and Takedown on INHOPE's homepage: <https://inhope.org/EN/articles/what-is-notice-and-takedown?locale=en>

- **Agree on collaboration principles in writing**

It is essential to have a written agreement, a Memorandum of Understanding (hereinafter MOU), between the hotline and the national LEA. The main importance of the agreement lies in (1) establishing a legal base for the hotline's work in handling CSAM as illegal material and (2) defining the respective roles and responsibilities of the hotline and the national LEA in the context of their cooperation.

Establishing a legal basis not only guarantees the lawfulness of the hotline's work, but also serves as LEA's official acknowledgment of the hotline as a partner organisation. By defining the hotline's role in the fight against CSAM and clarifying the support that the hotline will provide to law enforcement, the national LEA will have a better understanding of the nature and scope of hotline's work and responsibilities, which in turn also improves the quality of the collaboration.

Ideally the MOU should be concluded within the six months from the first contact with LEA. The establishment of MOU should not take more than two years. In case of difficulties to conclude a MOU with the national LEA, hotlines can involve other stakeholders to the negotiation procedures. For instance, national legal authorities could be included to the process.

Tip: Concluding a MOU or any other legal agreement can be time-consuming and renewing it can take as long due to possible changes in leadership and government. Therefore, it is advised to sign an agreement without an expiry date, but rather ongoing until terminated. The use of Annexes, and separate procedure and process documents is advisable so that in case of changes, these accompanying documents can be easily amended instead of seeking approval and signature for a new MOU.

- **Organise a general introductory meeting**

A key aspect of the establishment of a hotline is the relationship that the hotline has with the national LEA. Thus, the first stakeholder with whom INHOPE and any potential hotline makes contact is LEA in order to ensure that they are aware of the work of the hotline, and that they understand how a hotline and the INHOPE network of hotlines work in reducing the availability of online CSAM nationally and globally.

Hotlines are expected to organise a general meeting with the national LEA to (1) discuss the scope of their work and the support that they can provide to the LEA, (2) introduce the INHOPE network and the workings of INHOPE's technology platform for the secure exchange of reports of CSAM, ICCAM (ideally together with an INHOPE representative), and (3) identify the needs and expectations of the LEA. It is fundamental to foster mutual trust and a spirit of cooperation with the national LEA from the outset. This ensures that the parties can build a strong and mutually beneficial relationship.

Tip: Hotlines could suggest to the national LEA to issue a mutual press-release on the establishment of the hotline and its cooperation with LEA in the combat against CSAM.

Interesting to know: Several INHOPE hotlines have their national LEA on their Advisory Boards, or have members on the same Advisory Boards as the LEA. In this way they can ensure that LEAs are informed and up to date on the activities and challenges of the hotline.

- **Organise follow-up meetings**

Follow-up meetings should be organised at least every three months for the analysts and national LEAs to share knowledge and expertise, discuss the processes and development of collaboration, and tackle any obstacles. Hotlines are expected to share with LEAs their intel on CSAM and inform LEAs about the upcoming training opportunities with INHOPE (webinars/seminars). It is recommended to take written protocols of the meetings, especially regarding the agreed procedures.

Hotlines are encouraged to invite LEA officers to spend a day at the hotline's office and observe the work of the hotline in order to gain better insight into the work and competencies of the hotline. Equally, LEA officers should provide training to hotline analysts on how the relevant LEA unit works and how online CSAM reports are processed and classified.

- **Establish a contact person**

Hotlines should ensure that there is a contact person from the LEA who the analysts can directly contact in case of questions or urgent matters (e.g., emergency cases where there is a suspicion that the child is still in danger). E-mail addresses and phone numbers must be exchanged with the contact person to facilitate communication and guarantee that the necessary information will be exchanged in a timely manner. We encourage hotlines to build trust on an inter-institutional level as well as on a personal level.

- **Emphasis on bilateral partnership**

Hotlines are encouraged to emphasise that the cooperation between the hotline and the national LEA must be bilateral. This means that while the hotline is expected to provide the reports as quickly as possible, LEAs in return should aim to provide sufficient feedback to the hotline in a timely manner. This will allow the hotline to run smoothly and maximise its efficiency.

- **Create collaboration on multiple levels**

If applicable, a collaboration should be established with law enforcement on multiple levels: either at the federal, state and regional level or at a central and local level. In this way, the hotline will ensure wider cooperation with the national LEA and increase its chances of creating a stronger relationship with the LEA allowing the hotline to derive all the associated benefits (e.g., obtain more detailed feedback regarding the reports).

Tip: Hotlines should make sure that the relevant LEA officers are aware of the hotline's IP address(es). As hotlines work with CSAM online on daily basis, there is a possibility that LEAs come across with the hotline's IP addresses during active search or investigations. Thus, it is important to share the hotline's IP address to avoid unnecessary investigation activities.

Reporting

- **Agree with LEA on which reports are shared**

Illegal material: INHOPE member hotlines shall always notify national LEAs on illegal material, also in the event of ambiguity/uncertainty, regardless of where the material is hosted.

If the illegal material is hosted in the country of the hotline, the hotline will forward the report to the national LEA and will not use INHOPE's secure platform ICCAM.

If the illegal material is not hosted in the country of the hotline, the URL is inserted into ICCAM and is forwarded to the hotline in that country. Then that hotline takes the necessary actions, i.e., forward the material to national LEA and hosting provider as per their national agreements, for it to be investigated and removed by the relevant LEA in accordance with the applicable law. In case the illegal material is hosted in another country, the hotline will inform its national LEA about the illegal material and that it has been reported through ICCAM to the relevant hotline.

Non-illegal material: Hotlines are advised to reach an agreement with the national LEAs on how to notify LEAs about non-illegal material. The practice varies per member country. Some INHOPE hotlines do not report non-illegal material to LEA in order to save LEAs time and resources. Other INHOPE hotlines also report non-illegal material to LEAs for administrative purposes.

- **Report to LEA in a timely manner and establish prioritisation**

Hotlines should immediately inform the national LEA once the illegality of the report has been established. The aforementioned notification must be made by the end of the same working day on which the CSAM material was found illegal. LEAs should prioritise the reports sent by the hotline as these reports have already gone through the "first filter" and have been established as illegal by trained hotline analysts.

Tip: When the report is too voluminous and it is time-consuming to go through all the material, it can be reported to the LEA in smaller blocks. In other words, if the amount of illegal material is too large, it should be reported to the LEA in fragments at several intervals during the day.

- **Agree with LEA on how to flag urgent cases**

Hotlines are advised to agree with national LEA on how to notify urgent/high-priority cases. This can be done either through a phone call to the contact person or by stating the urgency explicitly in the notification e-mail.

- **Report in a structured and consistent manner**

LEAs should be notified about CSAM reports in a structured and consistent manner. Hotlines are advised to use a designated form/template to report CSAM to national LEA. It is strongly advised to create the reporting form/template³ in collaboration with the LEA. The reporting form/template could include the following elements: URL of the content, description of the type of the content, IP address - data about location of the server where illegal or harmful content was found, name of the hosting provider; details of the hosting service; password or referral, screenshots, information on whether the victim is identified and other comments of the operator.

Tip: For structured reporting, hotlines can use 'Text expander and auto text' software, like *PhraseExpress* and *TextExpander*. This will be useful for using text codes or for inserting text boxes, checkboxes and drop-down menus.

- **Use safe communication channels**

The report should be forwarded to the national LEA through a special web-tool or encrypted e-mail. The communication channel (including specific e-mail addresses) that the hotline will use to forward reports must be previously agreed upon with the LEA. If hotlines forward the reports through e-mail, the e-mail address should preferably be an email of a relevant unit or a group. Additionally, hotlines are strongly advised to have a contact person who is also reachable by phone. This is especially important for cases of urgency.

- **Get LEA's confirmation on receiving hotline reports**

Hotlines are encouraged to ask for a confirmation of receipt from the LEA after they have submitted the report. This is an effective way to ensure that the report has successfully reached law enforcement and can be further investigated.

Interesting to know: The Estonian hotline Vihjeliin has an agreement with the national LEA that following any report, the associated CSAM material will be kept only until the LEA has confirmed the safe receipt of the report.

³ Annex I: INHOPE's Template report to inform national Law Enforcement Agency on CSAM.

Notice and Takedown (NTD)

- **Agree with LEA on 'NTD body'**

An NTD body (the one responsible for notifying the Hosting Provider of illegal/irrelevant/outdated information) should be determined in a written agreement, preferably in the MOU. Hotlines are encouraged to take this role and involve LEAs only when the hosting providers do not reply to the requests of the hotline. In that way hotlines can effectively contribute to saving valuable LEA time and resources which can instead be used for active search and investigations.

- **Agree with LEA on fixed time when NTD is sent out**

Hotlines and LEAs should agree on the time an NTD is sent out to the national Hosting Provider.

If the NTD body is the hotline, the fixed time between reporting CSAM to the national LEA and sending out an NTD could be 6-24 hours by default. However, in some countries the default notification time is also up to 6 days. In case the LEA needs more time to investigate the material, they can ask the hotline not to send out the NTD for reasons of confidentiality. This procedure should also be explained in the written agreement between the hotline and the national LEA so that both parties are aware of the necessary steps to be taken when there is an ongoing investigation.

If the NTD body is the national LEA, the LEA needs to inform the hotline whether/when an NTD has been sent and whether/when the material has been removed. In several countries hotlines periodically receive (quarterly or every 6 months) statistical feedback from the LEA about the status of the relevant pending investigations.

- **Agree with LEA on notification of successful removal of CSAM**

To avoid possible 'double work' which may occur when a hotline and LEA are both inspecting the same Hosting Provider for removal of reported material, it is advised for the hotline to reach an agreement with the national LEA on how the feedback of successful removal of CSAM is given. If the hotline and the national LEA are sharing the responsibility of checking whether the provider has removed the material, the one that discovers first the successful removal of the CSAM material should inform the other.

Meetings and Trainings

- **Have at least two meetings per year**

Hotlines are encouraged to meet with the national LEA at least twice, ideally four times, a year to exchange expertise and knowledge. The purpose of these meetings is to evaluate the cooperation and identify areas for improvement, to discuss obstacles and analyse difficult cases, and to agree on further collaboration and the way forward. Shorter regular meetings between hotlines and national LEAs are encouraged.

- **Invite LEA for study visits**

Hotlines are advised to invite LEA officers to observe the work of the hotline and to spend a day at the hotline's office to understand the work of the hotline and the capabilities that the hotline has to offer to the national LEA.

- **Find possibilities for shared training**

Hotlines can build trust and cooperation through mutual training activities. In practice, member hotlines train national LEA, receive training from LEA, organise training together with the national LEA and are trained together with LEAs. INHOPE offers opportunities for national LEAs to join the hotline training meetings.

Interesting to know: ECPAT Sweden trains new police officers who start working with CSAM on children's rights and hotline services. Whenever a new analyst joins ECPAT's team, the new joiner is often sent to the assessment and self-awareness training organised by the national LEA. ECPAT Sweden has also trained embassies and has coalitions with tech companies and the finance sector together with the national LEA.

- **Consider having additional common projects**

Hotlines have flagged that mutual trust with LEAs has been largely built through additional activities such as advocacy and awareness raising campaigns. Hotlines have carried out different advocacy projects with national LEAs including e.g., creating video messages, books, leaflets, online slogans and conducting lectures at schools and kindergartens.

Interesting to know: The German hotlines establish together with national LEA annual joint statistics for the German Federal Government which reports about the cooperative work to the parliament to fulfil a political obligation.

Annexes

Annex I

Template report to inform national Law Enforcement Agency on CSAM.

ANNEX I

Template report to inform national Law Enforcement Agency on CSAM

REPORT

Hotline		
Date & time - report received from public		
Date, time, report ID number - report received from ICCAM system		
Date & time - report forwarded to LEA		
Does the report require urgent action (imminent threat)		

CONTENT

Description	Yes	No	Not sure
Offender identifiable?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Victim identifiable?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
If yes, is the victim identified?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Summary of the content:

Description of the type of the content, is the content self-generated, content data.

Useful information:

Anything that could help LEA with investigation: detecting from the material any text or voice which can lead to specific person or geographic location. Information on metadata.

LOCATION & TRACKING

URL address:

Password or referral (if needed):

IP address:

Name of the hosting service provider:

Details of the hosting service:

ADDITIONAL INFORMATION

Screenshots; comments on the operator or any additional remarks that the analyst would like to highlight, is the site is protected by Cloudflare.

If applicable, information on when Notice and Takedown is sent out by the hotline.

CONTACT INFORMATION

Hotline (name and add short description of the organisation)	
Email address	
Phone number	
Physical address	