Hotline Development Guide

Creating a hotline

http://hotlinedevelopmentguide.org/guide/creating-a-hotline/

The starting point for any initiative seeking to establish a hotline will be to understand the particulars of the national context in which the hotline will be developed.

Overall, this means conducting an environmental scan that takes in the local legislation, the socio-cultural context, the likely scale of the problem and existing efforts to combat the problem in your country.

Specifically, you will need to:

Identify the legal basis – will it be possible to set up a hotline?

Specific professional advice should be sought with regard to legislation which bears directly on hotline activities – seek support from local specialists, and expect them to provide clear guidance on issues such as (but not limited to):

- How clearly are the legal parameters of child sexual abuse images defined? – Is the existing legislation adequate?
- What are the legal implications of looking at an image of online child sexual abuse content?
- Is a cached image, automatically created when the
- Image is viewed, an offence (i.e. does that constitute 'creating' an image)?
- What exemptions would a hotline / hotline employee need to be able to view potentially illegal content to do their job?
- Are there issues around data storage (e.g. relating to the URLs, files, reporters ID / IP address)?

- Are there issues around maintaining reporter anonymity?
- What are the hotline's legal liabilities? What might happen if the hotline got sued?
- Does the hotline need to be a registered entity / charity or equivalent? What legal requirements are there in terms of ownership, governance, transparency and accountability? – Is there a requirement for a hotline to be managed under the auspices of a national authority (e.g. film classification board, a media and communications authority etc)?Depending on the type of organisation behind the proposed hotline, it may be possible to get pro bono legal support. NGOs have often benefited from pro bono legal advice in this area, however this may be less available to private sector organisation.

Build the 'business case' – is there existing research or data on the issue in your country?

Initiate multi-stakeholder dialogue

- Identify and bring together the main stakeholders for a hotline
- Convene a national roundtable and a working group for follow-up, read more about convening a roundtable here: Convening a Roundtable (PDF) (http://hotlinedevelopmentguide.org/cms/wp-content/uploads/2016/04/Convening-a-Roundtable.pdf)

For the video, please visit http://hotlinedevelopmentguide.org/guide/creating-a-hotline/

Once there is consensus on the need to develop an Internet hotline, it will be necessary to:

1. Identify the lead organisation for the hotline project

This means deciding in principle which organisation will operate the hotline. In some countries, the is the organisation driving the project based on experience, but in other countries this will be defined after the initial phase and may be an outcome of a national roundtable or consultation process.

Remember that deciding upon the operator of the hotline is not the same as deciding which organisations will fund the hotline, cooperate with it, or support it in other way. Building and operating a hotline is a collaborative process in all aspects.

The INHOPE network of hotlines is made up of hotlines from several sectors, including NGOs, private sector and public sector.

In the case of NGO-operated hotlines, a local NGO with experience in child sexual abuse issues is often a strong candidate. Not only do they have a good understanding of the scale of the problem in the particular country and related national legislation, but they may be able to help the developing hotline organisation to navigate law enforcement procedures and find the right contacts

within government and industry. They may also have direct experience working with children who have been victims of sexual exploitation and abuse through ICTs. While this experience is valuable, an NGO deciding to take on the operation of a hotline should prepare to maintain a clear distinction between victim support and CSAM management.

In a different way, hotlines that operate on the basis of Industry membership and with Industry funding are a manifestation of Industry's commitment to removing CSAM and other forms of illegal content from their platforms and services.

Hotlines operated by government agencies or regulatory bodies demonstrate very clearly the commitment of the government to protecting children from abuse and exploitation on the Internet.

2. Organise a learning visit to an experienced hotline in another country

Having established the national context, the hotline should seek to visit an existing hotline with a similar cultural context and operating to a similar scale as the intended new hotline.

Ideally key staff should be given the opportunity to spend time 'shadowing' the working day in an existing hotline with a comparable legislative, cultural and funding background, and similar levels of efficiency to those which are envisaged for the hotline being set up.

In order to benefit from direct experience, it would be helpful to visit a hotline which still employs the staff who were involved in the process of setting up the hotline. Whilst it may be of interest to visit the larger established hotlines, it should be remembered that these hotlines have levels of investment, staffing, technology and operational procedures that are entirely different scale to those which will be necessary for a new hotline.

Visiting an Experienced Hotline (http://hotlinedevelopmentguide.org/cms/wp-content/uploads/2016/04/Visiting-an-Experienced-Hotline.pdf)

3. Define the role and remit of the hotline

It is advisable to keep the hotline's focus as narrow and specific as possible. Ideally the focus will be purely on ICT-facilitated sexual exploitation and abuse of children, if not specifically on child sexual abuse material.

This is partly to ensure clarity of messaging and to prevent the hotline becoming a 'catch all' for reports of any content that users think is unsuitable. It is also to instil confidence in the hotline because it can be precise about the definition of illegal content it can process.

The organisation proposing to set up the hotline or that has been identified as the lead organisation to run the hotline within national framework should clearly outline its planned remit and scope in any proposals that are taken to and shared with the other relevant partners in the project. This helps to define nature of cooperation being requested with each partners, and to

make sure it is clear and contained.

Focus is important for clarity of messaging. However, this does not mean that the hotline service should avoid other types of reporting categories if these are important in responding to the local reality in the country.

When researching the particulars of the national context, it should be possible to identify the potential categories of report that need attention. These might include online child sexual exploitation activities and ICT-facilitated exploitation such as online grooming, sexual extortion, commercial sexual exploitation of children in travel and tourism, and live streaming of abuse.

Indeed, in smaller countries or emerging markets it may be crucial for a new hotline to take the lead in responding with local and possibly international partners to new and emerging trends in the misuse of technology and ICTs to target children.

However, the hotline service will in many or most cases be initiated and run by an organisation with previous expertise in these areas, and the service will often be part of a wider programme of education, prevention and awareness about the issues of child sexual abuse and exploitation online.

Whatever the case, it is essential for the hotline organisation to be realistic about its capacity at the start of the process. This is because for each type of report, the response and referral mechanism will be different, which will likely impact upon staffing and other resources. This must be addressed in the development of operating protocols by the hotline and must be clearly defined in the relevant agreements with other stakeholders.

In terms of governance, the hotline must be seen to be independent but with clear reporting lines to the competent authorities, to ensure transparency and accountability.

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Considerations for report management

One of the most important factors in a hotline development project is the framework within which reports will be managed. The global INHOPE network of hotlines is built upon national Internet hotlines operating a fully localised report management process. This means that the management of reports of child sexual abuse material takes place according to national laws and is guided by national processes and cooperation agreements between all the relevant partners from government, law enforcement, civil society and the Internet Industry.

This guide is designed as an essential resource to help set up a national Internet hotline as part of a national action plan to combat the online sexual exploitation and abuse of children. It is in

addition to support available from the INHOPE Foundation and the INHOPE network of hotlines in operation in over 45 countries.

However, in some circumstances it might be necessary and practical to consider an alternative option to the local management of reports. The Internet Watch Foundation – the UK's hotline – offers an international portal that enables reports of Child Sexual Abuse Material made in one country to be processed by expert analysts in the UK according to UK law.

In countries where upon initial assessment a localised Internet hotline may not be feasible in the short term, the INHOPE Foundation will advise the local organisation about its current options. This could include referral to the Internet Watch Foundation for advice on implementation of its international reporting portal.

Similarly, the Internet Watch Foundation can refer organisations in countries with the capacity and need for a localised Internet hotline to the INHOPE Foundation for further support.

Below is an introduction to these options.

A. Local management of reports by national hotlines

The INHOPE Foundation(http://inhopefoundation.org/) supports initiatives to develop a national Internet hotline in countries around the world, through INHOPE's Hotline Development Programme.

Hotline development support offered through the INHOPE Foundation is tailored to the needs and circumstances of each country. As such, the first step is a preliminary assessment of the existing basis and feasibility of a hotline in the country. This normally takes place through bilateral dialogue with one local partner, or through a national roundtable to identify the key stakeholder and ideally one lead partner to take the project forward.

In cases where a national reporting hotline is considered feasible, the INHOPE Foundation will work with the local organisation to provide advice and facilitate connections with other organisations where appropriate to ensure that the necessary legal, political and policy basis for a hotline are put in place.

As the project develops, the INHOPE Foundation will participate in project development meetings. The local partner is encouraged to convene a national multi-stakeholder roundtable as early as possible in the process so that the roles and responsibilities of each relevant organisation are clearly defined. If this has taken place, momentum should be maintained through regular working group meetings.

In addition to ongoing hotline development consultancy and stakeholder engagement, INHOPE Foundation facilitates training and mentoring by experienced hotlines in the INHOPE network. Depending on available resources and the needs of the country, it may also support hardware and software acquisition, website / reporting portal development and assist with translation or

communications support at the relevant stage of the project.

Whatever the circumstances, the INHOPE Foundation emphasises the importance of a sustainable and autonomous local base for any hotline. This means designing a hotline service that is realistic in size and scope, that reflects the needs of the country, and that in the majority of cases will be integrated into the existing operations of a qualified organisation in the country.

B. Remote management of reports

The Internet Watch Foundation(https://www.iwf.org.uk/) was one of the first Internet hotlines for the reporting of Child Sexual Abuse Material to be established anywhere in the world. Today, the IWF is a leader in the field. The IWF is the UK member of the INHOPE network. As part of its services, the IWF has launched an international reporting solution (https://www.iwf.org.uk/partnerships/international-reporting-solution).

Working with Stakeholders

It is not possible for hotlines to operate successfully in isolation. Indeed, their success depends upon cooperation with any and every organisation at national level that has responsibility for the removal and investigation of child sexual abuse material and the online sexual exploitation and abuse of children in general.

In addition, for an organisation planning to apply for INHOPE membership, the INHOPE statutes require a hotline to establish and demonstrate strong working relationships with:

- Law enforcement
- Government
- The internet industry
- Child welfare agencies

Being an INHOPE member implies a commitment work working with other hotlines around the world and with INHOPE to exchange reports of CSAM.

Below is an overview of considerations for working with the most relevant stakeholders in any hotline project.

For the video, please visit http://hotlinedevelopmentguide.org/guide/creating-a-hotline/
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Government

Government support for the hotline initiative will be critical to its success in a number of ways, including to:

- Manage potential issues related to navigating or re-defining legislation
- Provide credibility in the eyes of other key stakeholders and the general public
- Identify opportunities for government funding
- Enable law enforcement to give the hotline the required levels of assistance.

It is likely that there will be two main governmental departments whose approval and involvement will be required:

- The department with a remit for Information and Communications Technology, such as the Ministry of Communications. This department may:
  - Already oversee an active online safety programme
  - Play a valuable role in promoting the hotline to the public as part of its wider safer internet activities
  - Have responsibility for deciding whether the hotline initiative can operate in a self-regulatory as opposed to a formally regulated / legislated environment
- The department with a remit for law enforcement, such as the Ministry of Justice. This department will be able to:
  - Assist with legislative issues, such as defining the assessment of legal and illegal content
  - Endorse and oversee involvement by law enforcement with the hotline's work
  - Authorise and sign a written agreement with the organisation operating the hotline, unless the agreement can be made directly with law enforcement. This agreement should cover the authorisation of the hotline employees to receive, open and assess content, and could be supported by formal approval of the hotline's operational procedures regarding the management of illegal content.

Timeline

The relevant government ministries and the relevant law enforcement unit should ideally be contacted in parallel to avoid complications. Each has an important role to play in supporting the hotline, and this needs to be defined early on, for example at a national roundtable or stakeholder meeting.

In some cases, this process may be reversed since these same stakeholders may be involved in selecting and endorsing the organisation that will operate the hotline.

Data Protection

The relevant Law Enforcement Agency (LEA) and hotline organisation will need to collaborate from an early stage with the national data protection agency to understand any implications for the hotline and its proposed activities and processes.

Law enforcement

A strong working relationship with law enforcement, right from the development stages, will simplify and strengthen the processes relating to the foundation and running of the hotline.
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Tips for engaging with the national law enforcement agency

Get law enforcement involved early on

Depending on the specific situation in the country, online child sexual abuse material may not be a priority issue for the national LEA. If this is the case, law enforcement will need to be sensitised to the scale of the problem, the wider international backdrop, and the role of a national hotline within this context. Reference can be made to the Model National Response and to multi-stakeholder cooperation to support local capacity building by the relevant International partners. As such, international law enforcement will play a crucial role not only in sensitising their colleagues to the challenges of online child sexual exploitation and abuse, but also in providing training, evidence of the problematic in the country, and operational support.

INHOPE statistics regarding trends in the hosting and categories of child sexual abuse material are also available to provide an evidence base for a hotline and demonstrate to law enforcement the imperative of action on this issue. INHOPE can also meet with the relevant law enforcement agency to share their insights.

Whatever the case, early involvement of law enforcement helps to avoid a situation where government has become engaged and the hotline is 'forced' upon law enforcement without warning. This could understandably create resistance and, in fact, a later engagement could also fail to fully exploit valuable expertise and consultative support from the law enforcement agency during the development stages.

Identify the relevant law enforcement unit

In most countries, there is a unit for crimes against children that might also cover issues relating to domestic violence, sexual assault, family crimes and similar. However, this unit may not have a mandate for the 'cyber' dimension of these crimes, and there may be a cybercrime unit that would

be expected to lead on these. In countries without a dedicated unit for online crimes against children, this challenge is common – is it a 'cybercrime' to be handled by the cybercrime unit, or a 'real' crime with 'cyber evidence' that should be handled by the child unit?

Because of this, it may be difficult to identify one single unit responsible for investigating online child sexual exploitation. If it is unclear from an external perspective, the relevant government department should be able to define responsibility. As a country develops and implements a national action plan to protect children from online exploitation and abuse, the establishment of a dedicated unit would normally take place. However, in the early stages, a hotline could be required to work with several law enforcement departments.

Engage law enforcement at the most senior level

Support and traction for the hotline 'from the top down' is very important. Depending on the organisation(s) involved in setting up the hotline, it can be difficult to get access to a senior figure in law enforcement. If this is the case, INTERPOL,which covers Child Sexual Exploitation on the internet through its Vulnerable Communities Sub-Directorate, may be able to assist with an introduction through the country's National Central Bureau (NCB). The Heads of NCBs are typically high up in the national police structure. In addition, the NCBs are the gateway for gaining access to INTERPOL's "block list"named as INTERPOL "Worst of"-list with domains that contain the most severe) child sexual abuse images, which will be of relevance to industry partners seeking to introduce this type of blocking.

Preparation and documentation of the business case will help law enforcement understand the project and their role in relation to it. The organisation planning to set up the hotline should prepare to present:

- Information on context, scope and ambitions for the hotline
- Draft proposals for law enforcement's role in the development process
- Documented and transparent procedures relating to issues such as office and IT security, staff welfare and report processing. These should be clear, but it is important for law enforcement to be invited to help build on them further once there are more involved in the process

An initial meeting could take place at the premises of the organisation that will operate the hotline, giving law enforcement the chance to see the organisation and visualise operations for themselves.

In terms of the ongoing relationship with law enforcement, certain parameters will need to be established, such as:

- What are the priorities?
- How much support are they able to provide?
- How will they manage reports / investigations?

- Who will take responsibility for what?

The nature of the relationship and the details of cooperation will often not be managed in a single meeting but are part of an ongoing process.

The positioning of a new hotline will also depend on the existing law enforcement capacity to respond to online child sexual exploitation.

If there is already a dedicated law enforcement unit with a mandate to investigate online CSEA, the need for a non-law enforcement reporting channel may not seem obvious to them, especially if they have their own reporting mechanism in place. As well as educating them on the value of a hotline, it is essential to build trust between the hotline and the relevant law enforcement unit. This can take time and should be seen as an iterative process.

Law enforcement should be presented with an overview of the role and value of a non-law enforcement hotline to help:

- Engage and educate the public about the importance of reporting online CSEA
- Encourage reporting by offering anonymity. A non-LE hotline offering the possibility to make anonymous reports can be a valuable additional source of information regarding online CSAM.
- Channel URLs hosted in other countries to the relevant country via the INHOPE network for removal at source
- Reduce the overall availability of online CSEA material for the public
- Reduce the workload of law enforcement by filtering out reports of non-illegal content according to the national legislation of the country, and referring only relevant reports to law enforcement. The law enforcement unit may require a copy of all reports sent to the hotline, and they may decide to quality control report management by the hotline. However, when designing the workflow of the hotline, a joint report or content assessment training with the relevant law enforcement officers and hotline analysts can help build the confidence necessary for the hotline eventually to act more autonomously and refer reports directly to the international hotline network. An effective hotline ultimately saves times for law enforcement, particularly in countries where there is limited hosting and therefore minimal requirement for local law enforcement to initiate notice and takedown processes.The majority of URLs reported to most hotlines will not be subject to investigation in that country. Where the content of a URL reported to a hotline is found to relate a to a particular country, the close cooperation between hotlines and law enforcement at national and international level should ensure that the relevant law enforcement unit is notified. Since 2015, INHOPE has provided to its members a content hashing and classification tool that makes confirmed CSAM available to INTERPOL for their assessment and potential action with the international law enforcement network.

Joint Capacity Building

Where there is an existing law enforcement unit a mandate to investigate crimes against children but not necessarily trained in the specifics of online or ICT-facilitated CSEA, capacity building for that until may take place in parallel to the development and training of the non-LE hotline.

Personal contact within an institutionalised relationship

To promote successful relationship building and facilitate open lines of communication on an ongoing basis, the hotline could request a part time dedicated police "liaison officer" to be the official contact for day-to-day operational issues. For example, an officer could be seconded for half a day each week and this officer could have his or her own office space at the hotline.

It would be extremely valuable to have one committed individual who could be trained up to the right level of expertise and who could manage the working processes between the hotline and the rest of law enforcement. Although this would represent a substantial commitment from law

enforcement, it would bring benefits of closer working relationships with industry, as well as education and experience from the international law enforcement community.

Despite the importance of specific points of contact and individual relationships, the relationship between the hotline and law enforcement must also be institutionalised so that staff turnover will not affect cooperation between the two.

Law enforcement Training

If law enforcement officers have ready access to ICTs – and are skilled in their usage – as well as experience in online child sexual abuse investigations, law enforcement should be invited to take the leading role in training the hotline's content analysts.

However, depending on the market context, law enforcement officers in some countries may have little or no experience in the area of ICT and / or investigations of online child sexual abuse images. Police involvement in the hotline will nevertheless be important, so it may be necessary for the relevant police officers to have additional training in order for them to be able support the hotline's activities.

Options for this could include the following:

- **Interpol**
  National law enforcement should reach out to Interpol, which is involved in the delivery of training courses (e.g. skills transference) and other training options for police officers; Interpol is currently establishing a curriculum targeting victim identification for LE. Relevant police officers would also benefit from becoming members of the Interpol working group so that they can be involved in – and learn from – related activities, as well as contributing to the International Child Sexual Exploitation Image database (ICSE DB).
- **The International Centre for Missing and Exploited Children (ICMEC)**
  Through its Global Training Academy, ICMEC operates a programme of International Law Enforcement Training. Since 2003, ICMEC has trained more than 8,000 individuals officers on essentials of technology-facilitated crimes against children (for law enforcement and for prosecutors); advanced online exploitation investigations; and advanced technologies.Training is delivered by experienced law enforcement officers from national agencies as well as international organisations such as INTERPOL. These trainings are often sponsored by industry partners and delivered in the relevant country or region. In order to develop the course, ICMEC carries out a pre-assessment of a country or region, to confirm the specific training gaps, and then builds a programme that could cover a range of required areas, such as:
  - Technology used by offenders – which technologies, how are they used
  - Online investigations, with case studies: how to deal with digital evidence, how to find

the victim behind the image, how to interview the victim, etc
  - Prosecuting techniques
  - International collaborationFor more information, contact ICMEC: Guillermo Galarza, Program Director, Training Programs and Outreach, ggalarza@icmec.org.
- **National industry**
  Industry partners and industry associations within a country could also be a resource to provide training in ICTs as part of their contribution to the hotline and law enforcement.

The Internet Industry

One of the major benefits of having national hotlines in place is that they facilitate the removal of illegal content that is being unwittingly hosted by service providers in that country.

Similarly, hotlines may be able to provide access to "block-lists" of URLs known to contain or digital fingerprints corresponding to confirmed child sexual abuse content – something which is increasingly in demand from ISPs.

For these reasons, it is vital that the national internet industry understands and shares the objectives of the hotline.

Depending on the market context, it might be necessary to invest time and effort in educating key industry players on the nature of the problem, the role that hotlines already play in other countries and how they work with industry.

Potential industry partners must understand that the hotline can help them keep their services free of illegal content, as well as protecting their customer care staff from having to look at traumatic content should they receive a report from a customer. As a minimum, they must also understand the processes they will need to have in place in case the hotline alerts them to the presence of illegal content on their services.

In some cases, industry will actively contribute to the hotline, whether financially, or with in-kind support such as IT and training.

When trying to gather support from Industry, companies should be presented with specific proposals. Engage both with the industry association if there is one and with the major individual companies in the market. The nature of the market in question will make it clear who should be targeted.

A growing number of multinational companies from the ICT sector have developed global public policy or corporate social responsibility programmes for Child Online Protection. Not only are these an invaluable source of best practice in industry, but they enable a multiplier effect as these policies and guidelines are introduced to the local markets in which these companies operate.

Nevertheless, it can be challenging to at first to engage Industry, especially if this means cooperation with directly market competitors in the local market.

Before engaging with specific companies, seek to understand their general guiding principles and find an individual within that company who is committed and receptive to ideas, and work closely with that one individual. Experience has shown that individual relationships can be crucial to progress.

The hotline needs to build up a proposal for industry players, covering:

- Any correlation between hotline proposals and government mandates
  - Is the government 'encouraging' industry to be active in this space already?
  - What does national legislation and regulation say?
- The hotline's remit and scope –
  - Clearly define the type of content the hotline will be focusing on, and the services it will offer.
- The benefits it will bring to industry
  - corporate responsibility, 'clean' services, staff protection
- The kind of support that particular player can offer to the hotline, such as:
  - Financial or in-kind support
    - hardware and software, web hosting, internet connection
  - Technical support
    - training hotline analysts to understand how they manage content on their platforms
  - Communications support
    - implementing a 'report abuse' button linked to the hotline on their platforms
    - promoting the reporting service to their clients through direct messaging
    - providing free advertising space
    - sponsoring public awareness events

Ideally, the hotline will be supported by all players across industry. This should be actively encouraged from the outset through cross-sector representation at the relevant roundtables and working groups. International organisations including GSMA and UNICEF can provide guidance and support as well as activate their networks to support this process.

However, commitment and leadership by one or two ISPs is an important starting point. Both they and the hotline organisation, as well as other governmental, civil society and international partners must encourage cross-industry engagement.

Messaging on this issue should be clear: preventing and responding to the online sexual exploitation and abuse of children is a shared responsibility that should be free of any commercial or brand-related dimension.

The relationship between the organisations running the hotline and industry is a dynamic one. As technology and patterns of connectivity develop, it is essential to maintain good channels of communication and to ensure commitment from both sides to adapt to these changes. It can be helpful to schedule regular meetings as well as an annual event or training.

For Industry, working with a hotline organisation to tackle the online sexual exploitation and abuse of children is an opportunity to lead by example, and it should not be seen as an exercise in branding. Even if there is only one Industry partner involved at the time the hotline service is launched, there should be agreement in place for additional companies to get involved in what must be a collaborative effort.

A hotline that is 'branded' by one individual company also risks impacting relationships with key stakeholders such as law enforcement, as it may create the perception that the hotline is an initiative of a single commercial business.

Where an industry player is the driving force behind the hotline, it should still seek to include other players. Additional brands lend credence to the hotline and may forestall formal legislation. Co-branding may also lead to co-funding.

For both the hotline organisation and Industry partners, the following are useful in building and maintaining a strong relationship:

- **Communication**: Have clear and efficient lines of communication – the hotline will need to have contact details for the relevant colleague at each ISP.
- **Documented procedures**: Document procedures – what should industry expect from the hotline, and vice versa? Again, this is show clarity and transparency. Documenting procedures also makes it easier to manage issues relating to staff turnover.
- **Regular meetings**: Have physical meetings and briefings – invest man-hours in building relationships, showing what the hotline is doing, sharing its achievements, listening to any concerns that industry has.
- **Problem solving**: Solve problems in closed groups – for example, if an industry partner does not actually do what it claims it does in public in terms of reacting to notifications from the hotline, meet to discuss the problem and find a solution. 'Going public' with problems should not be used as a means of resolution. This is critical for maintaining trust.

- **Mutual understanding through dialogue**: Consider the industry perspective – if industry has a problem with the hotline, see if their views can be accommodated too in the spirit of 'give and take'.
- **Commitment to improvement**: Always challenge operations to improve them – strive to improve the collaboration all the time. The hotline may be fulfilling its remit, but what else could be done or what could be done better?

Child Welfare agencies and civil society organisations

It is important to emphasise that there is no single model for a hotline service . However, a significant proportion of hotline services currently in operation around the world are operated by non-governmental or civil society organisations with a child welfare or child protection remit. Many have specific expertise in relation to online CSEA.

CSOs are often well placed to operate a reporting service for a number of reasons. These include:

- Evidence based and general knowledge of the issues, often based on its own research or research in collaboration with partners
- Experience dealing with sensitive information and sometimes directly with children and victims of exploitation and abuse
- Independent organisation to which the public may feel more secure reporting
- Autonomous voice advocate for legal and policy changes
- Independent source of accountability for government and the private sector
- Pre-existing relationships and experience building relationships with many partners, including across civil society and child welfare institutions
- Experienced and committed staff with a less frequent lower turnover than is often seen in governmental and private sector departments

A lack of sustainable funding is a common concern raised in relation to CSO operation of a hotline service. However, CSOs by their very nature are agile and adaptive and often very creative in the way they seek to fund a particular area of their work.

In addition, it is important to emphasise that a CSO operating a hotline service is not and should not be responsible for 100% of the funding needed to provide that service. A hotline service is a collaborative endeavor and this should extend to the way it is financed.

If the hotline service is operated by an organisation from another sector, whether governmental, academic or private sector, it is important to build strong relationships with CSOs for many of the same reasons listed above. CSOs can offer a different perspective on the issue, can help provide continuity to the project in the face of staff changes, and can sometimes reach populations that are harder to reach for governments and law enforcement.

If the hotline is an initiative of industry, for example a hotline operated by an ISP Association, CSOs can offer subject-matter expertise that may not be present at the start of the hotline's life, can influence efforts to change legislation, and they can be a crucial partner in promoting the reporting service to the general public.

CSOs are well placed to judge the degree and nature of awareness-raising activities that will be required for the hotline to succeed, and, ideally, already run awareness-raising campaigns in a similar or related area.

INHOPE and the Global Network of Internet Hotlines

National hotlines provide an essential service in their country. They operate within cooperative frameworks and are key part of any national response to online CSEA.

In addition, and crucially, national hotlines are the national link in the global network of hotlines coordinated by INHOPE.

INHOPE provides a secure technology platform through which its members collaborate with each other on a daily basis. Due to the sensitive nature of the information being shared, and the essential nature of trust within a network, access to this platform and other services are only available to members of INHOPE. To gain membership, the organisation running the hotline service must comply with minimum criteria and be prepared to cooperate with assessments and quality control processes laid out by the membership with INHOPE.

In short, a national hotline can only reach its full potential through cooperation with partners in the relevant national and international networks. Therefore any organisation building a hotline service from scratch should do so with the aim of becoming an INHOPE member.

Qualification for membership of INHOPE will not necessarily be immediate. Indeed, for financial, procedural or technical reasons, it may be several years before an organisation operating a hotline service is ready to apply for membership. Although the essential elements for hotline operation must be met from the start, new hotlines will grow and adapt in their first years of operation, and they will often play an important role in advocating for legal or policy changes that will enable them to meet their full potential.

To help provide guidance and interaction with the network, INHOPE created a charitable arm the INHOPE Foundation in 2010.

Funding and Sustainability

Ensuring adequate and sustainable funding sources is critical. Hotlines are unlikely to fail

due to lack of relevance, public interest and support, but occasionally they have failed due to lack of sustainable funding or to unforeseen economic downturns.

Consideration should be given to diversity of funding sources from the start. A hotline service funded by multiple sectors and/or organisations will be more resilient. This also means that the cost of supporting a hotline services is shared among stakeholders, which re-enforces the collaborative nature of the undertaking.

In many cases, however, funding and relevance are co-dependent. The relevance of the hotline service is both the origin and an outcome of its creation. Building the business case for a national hotline will be important for its longer-term survival.

What is the cost of setting up and running a hotline?

This is a common question from all sides in the early stages of a hotline development project.

In reality, the actual set-up and running costs of a hotline will depend on a number of variables. These include:

- Local costs in the country of operation
- Existing infrastructure within the organisation that will operate the hotline service
- Size and scale of the planned operation
- Standing and new commitments of financial or in-kind support (e.g. office space, connectivity) from local industry partners or international partners

However, a business model will probably need to account for most of the following items

- Personnel: recruitment, training, salaries, counselling, insurance (e.g. to cover personal injury claims from staff)
- ICT: website development and maintenance costs, phones and phone lines, internet connectivity, computers / printers /photocopiers / fax, local Report Management System, security software
- Office: premises, utilities, security, insurance
- Additional: Promotion / PR / advertising collateral, legal counsel, accountancy / financial

planning support

Since in many cases the hotline service will be run by an existing organisation with a broader remit and activities, these costs will often not fall solely upon the hotline service but will be part of the overall costs of the organisation.

Nevertheless, there are cost implications to adding any new service or activity to the work of an organisation, and these must be given careful consideration in the planning phase. Organisations can consider seeking in-kind donations for items such as hardware and software.

For the video, please visit http://hotlinedevelopmentguide.org/guide/creating-a-hotline/

Applying for government funding

Governments can be a useful source of funding, and getting funding commitment from the government affords secondary benefits in terms of visibly demonstrating government support for the hotline, thereby enhancing credibility.

Things to consider if applying for government funding include the following:

- **International dimension**
  It might be advisable to give evidence of becoming an INHOPE member in order to give the international context of the hotline
- **Cross-sector partnerships**
  If applying as a corporate entity, you need to show that your organisation will offer seed funding and that you have other partners involved. It is unlikely that a lone industry player will succeed in gaining government funds. Assuming an NGO is also involved, it is preferable that the industry player is not the lead applicant. Let the NGO be applicant and request funding on the basis that Company X has promised e.g. 50 per cent and government support is sought for the remainder.
- **Consortium structure**
  In some countries, it may be easier to apply for money or funds as a consortium with other organisations which are running related 'Internet Safety' initiatives. For example, applying for a complete child online safety / protection / education package – not just a hotline – can be a more powerful approach in certain circumstances, provided that each of the parties within the consortium has credibility.

Internet industry funding

There is logic to industry helping to fund hotline activities, as the industry benefits directly from the hotline's ability to help ISPs keep their services free from illegal content and to protect their staff from having to deal with issues relating to illegal content themselves. There are also additional

benefits to be gained from supporting a hotline which relate to positioning and corporate responsibility. Industry is instrumental in providing funding in a number of markets.

Funding from unrelated industries and/or private donors

It may be possible to secure funding from organisations that do not have a direct role or direct benefit from the hotline service. These could include:

- **'Non-internet industry' private sector sources**: These would not expect to use the hotline 'services' but may nevertheless willing to contribute funding to a hotline as part of their corporate responsibility programme. Before accepting the donation, it is important to understand the motivation and any expectations the company may have in terms of publicity or branding. This will help avoid misunderstandings and protect the mission and reputation of the hotline.
- **Charitable foundations and other grant giving organisations**: These may have funding for projects that address the sexual exploitation and abuse of children or even specifically online sexual exploitation and abuse of children. Indeed, there is increasing understanding of and concern about the linkages or blurred lines between 'online' and 'offline' CSEA.
- **Private benefactors**: These can also be a source of funding. However, try to avoid over-reliance on this type of funding. Whilst the internet industry have a vested interest in the continued success of the hotline, non-related industries and private individuals might not have the same long term commitment.

Before seeking or accepting private funds, the origin of funds should be established, and any potential reputational risks identified. For example, consider:

- What kind of company or individual is offering funds
- What, if any, are the 'public relations' or other motivations for offering funding to a hotline
- How might this impact on the hotline?

For the video, please visit http://hotlinedevelopmentguide.org/guide/creating-a-hotline/