



European Parliament Debate, Thursday 17
September 2020: Combatting the sexual abuse and
exploitation of children

About the Internet Watch Foundation (IWF)

The IWF is an international Hotline whose mission is to eradicate child sexual abuse online. We help victims of child sexual abuse worldwide by identifying and removing images and videos of their abuse.

Europol states that we are one of the most active and efficient Hotlines in the world, and we work in partnership with the internet industry, law enforcement, and other Hotlines globally to remove this content. We are the only Hotline in Europe permitted to proactively search for content. We offer a secure and anonymous reporting function for over 2 billion of the world's citizens in 41 countries, across 4 continents, to report incidents of suspected child sexual abuse. We also offer services to the technology industry to keep their platforms free from child sexual abuse.

Key asks:

- **To end Europe's unfortunate position as the global hotspot for the hosting of child sexual abuse images and videos.**

To this, the European Commission must:

- **Replace the 2011 directive on combatting the sexual abuse and sexual exploitation of children with a Regulation directly applicable across EU Member States. This would resolve the current transposition issues and provide clear Europe wide standards.**
- **Make best use of the experience and expertise of Hotlines. They must be empowered to proactively search for content, be given a clear and explicit legal role and be appropriately funded.**
- **Continue to fund the work of Safer Internet Centres, particularly focussing on education and awareness initiatives to tackle a growing and disturbing rise in self-generated indecent images of children.**

Europe has become the global hotspot for the hosting of child sexual abuse imagery. 89% of the worlds known child sexual abuse imagery is hosted in the EU. The proposed legislative changes must put a stop to this.

- In 2019, **89% of the 132,700 webpages** assessed by the IWF to contain imagery of the sexual abuse of children were hosted within Europe. **71%, or 94,000 webpages**, were hosted in the Netherlands.
- Of the 132,700 webpages confirmed to contain this, **84% were found on image hosting boards and sites**. Image hosting boards are internet forums which operate mainly through the posting of images and are used for discussion on a variety of topics and issues. They are very similar to bulletin board systems but with a focus on images. Image hosting sites let users upload images which are available through a unique URL and this URL can then be used to make online links, or be embedded in other websites, forums, and social networking sites.
- Some of these hosting companies are either slow to act, or ignore requests for removal, exploiting legal loopholes enabling them not to remove content without a court order. The European Commission must address those companies who currently do not actively engage with discussions on this issue and are responsible for hosting a disproportionate amount of child sexual abuse.

The European Commission must replace the 2011 Directive on combatting the sexual abuse and sexual exploitation of children (the Directive) with a Regulation to address the challenges surrounding non-transposition of the Directive

- In 2019, the European Commission announced that it was opening infringement proceedings against 23 Member States for failing to transpose the 2011 Directive.
- Proposing a Regulation would allow the European Commission to make a considerable impact to address this global problem, compelling Member States to take greater action and laying out clear standards, expectations and requirements for action, helping to harmonise the response to this abuse in Europe. We believe this would also solve the transposition issues with the current directive.

The European Commission must make best use of the expertise of Hotlines, empowering them to be most effective, and allow them to compliment the work of law enforcement.

- **Proactive searching-** We believe Hotlines should be empowered across the EU to proactively seek child sexual abuse imagery and action its removal as trusted flaggers to internet companies. The IWF is currently the only Hotline permitted to do this in Europe. In the first year of proactive searching in 2014, we saw a **118% increase in the amount of content** we were able to remove.
- **A clear and explicit legal role for Hotlines-** We are calling on the European Commission to make best use of their knowledge, expertise, and insight. Hotlines must be given an explicit legal role, standardising their ability to view content, issue Notice and Takedowns, and proactively search for content, and must be adequately funded.
- These powers will allow Hotlines to protect more victims from revictimisation, and allow law enforcement to focus their efforts on identifying offenders,

Child sexual abuse is a global problem, that requires a global solution. The European Commission must work with centres of expertise across the globe.

- The global nature of the internet transcends traditional boundaries and jurisdictions. Legislators across the world are moving to regulate the digital world, and there is a danger that regulatory systems will fragment.
- In proposing such comprehensive legislative change through the DSA, the EU strategy on the rights of the child, and the EU strategy for a more effective fight against child sexual abuse, the European Commission has a real opportunity to redefine the fight to eradicate this abuse. The European Commission must foster a spirit of collaboration and cooperation, to ensure a coordinated response to this abuse.

Tackling the rise of self-generated indecent images of children: the need for education and awareness raising.

- In 2019, **almost one third (38,000 webpages, or 29%)** of all the imagery actioned by our analysts was assessed to be 'self-generated'. In many cases, the children appear to have been groomed, deceived, or extorted into producing sexual imagery of themselves, which have then been widely shared. This crisis cannot be purely tackled through regulation alone.
- The Better Internet for Kids Strategy must be updated to including providing appropriate relationship and sex education, including discussing healthy relationships, sexting and how to block, report, and respond to inappropriate requests to address this crisis.