



Annual Report 2020

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Foreword Prof. Dr. Christian Kastrop, State Secretary at the Federal Ministry of Justice and Consumer Protection

Dear Members of the eco Complaints Office,
Dear Readers,

It goes without saying that the dominant topic of the last twelve months has been the COVID-19 pandemic, with its profound impact on society, politics, culture, the economy, and our individual daily lives. In parallel to this, however, digitalization has experienced an enormous boost in all areas of life. In so far as possible, business and the public sector are sending a large proportion of their employees to their home offices, schoolchildren are taking part in lessons via video chats, and concert halls are only broadcasting their concerts via livestream on the Internet. Even celebrations are only possible on a virtual level. All of these digital paths ultimately enable us to manage our day-to-day lives in the pandemic, at least to a certain extent.

But at the same time, hate speech, disinformation, and conspiracy theories are spreading at high speed in the digital sphere. This is not only having a negative impact on digital communication, but is also threatening the foundations of our democracy and our pluralist societal system. Here, a trend of recent years is intensifying: people who are active on the Internet are increasingly exposed to devaluation, discrimination, and hate speech. Actively engaged people are withdrawing and leaving the

field open to hate speakers and extremists. And words are sometimes followed by deeds; think, for example, of Halle, Hanau, Samuel Paty, or Walter Lübcke.

With the German Network Enforcement Act (NetzDG), we have therefore obliged the providers of social networks to take down criminal content following related complaints. However, take-downs under the Network Enforcement Act only take place if the providers of social networks gain awareness of the criminal content. On the strength of its reports, the eco Complaints Office makes a significant contribution to ensuring that criminal content on the platforms is removed. A particular focus of the eco Complaints Office's activities is the reporting of child pornography content which, in addition to hate and incitement, is another area in which criminal investigation must take place quickly and effectively – in the digital as well as the analog space.

Sexualized violence traumatizes children for their entire lives. Combatting it is therefore one of the most important socio-political challenges of our time and a central task of the state. As such, in order to better protect children against sexualized violence, the future reporting obligation of social network providers set out in the Network Enforcement Act also extends to the criminal offense of Section 184b of the German Criminal

Code: dissemination, procurement, and possession of child pornography content. The European Commission's proposal for the Digital Services Act (DSA) also envisages a similar – but still to be refined – regulation, which we intend to support with great commitment at the European level, in this respect as well as in others.

In its 2020 Annual Report, the eco Complaints Office provides an impressive testimony of how it helps in particular to combat illegal content. The fact that over 96 percent of justified complaints were taken down in the 2020 reporting period represents a major achievement. I am equally pleased about the support of the eco Complaints Office in the German federal government's Annual Report on the take-down of child pornography telemedia offerings, and its participation in the "Dialogue on the Future of Social Networks" of the German Federal Ministry of Justice and Consumer Protection (BMJV). I would like to express my sincere thanks for your active commitment and congratulate you on the 25th anniversary of the Complaints Office.



Prof. Dr. Christian Kastrop
State Secretary at the German Federal Ministry of
Justice and Consumer Protection

Foreword Dr. Günter Winands, Head of Office for the Federal Government Commissioner for Culture and the Media

**Dear Members of the eco Complaints Office,
Dear Readers,**

In order to shape our societal interaction in a vibrant and secure manner, we are all called upon to assume responsibility. This also applies to the digital space, which nowadays makes up a significant and ever-growing part of our lives. For 25 years, the eco Complaints Office has been making a truly valuable contribution to strengthening law enforcement online. In particular, it protects children and young people from harmful content. On the occasion of this year's anniversary, the German Federal Government Commissioner for Culture and the Media welcomes the opportunity to express her gratitude for the eco Complaints Office's commitment in the fight against prohibited content on the Internet!

The work of such a self-regulatory complaints office (also referred to as a hotline) is becoming increasingly important for our society. Right now, in the times of the current Corona pandemic, so-called screen time has continued to grow significantly due to home office and schooling: The Internet is connecting us across generations, even when physical distance is required. For each individual, such exchange is particularly important just now – at least digitally, we still have the opportunity to stay connected to the world outside of our own four

walls. But in looking through the equivalent of a magnifying glass, what this also makes clear is that advancing digitalization harbors not only advantages but also dangers. More than ever before, everyone is coming to the realization that the Internet offers profitable and indispensable access to the communication and information services of our time – but that it also bears immense risks.

In this context, the eco Complaints Office stands as a model for modern youth media protection. It sends out a clear signal that the Internet should remain a safe space for many activities – especially for young people, who spend several hours online every day and are likely to be confronted with a lot of disturbing content. The concept of a hotline based on cooperation and solidarity: Each and every one of us can report illegal and youth-endangering Internet content to the eco Complaints Office. In this way, everyone can help to effectively combat dangerous phenomena such as cybergrooming, cyberbullying, or sexual harassment.

In order to be able to sanction unlawful deeds, they must first be detected. To this end, the first important step is the complaint. Everything else is taken care of by the eco Complaints Office: the complaints received are assessed; if necessary, contact is made with the plat-

form provider; and if a criminal act is suspected, criminal charges are filed. It would be nice to hope that the eco Complaints Office will have less work to do in the future, because together we are limiting the risks of the Internet, countering dangers, and thus opening up a safe space full of opportunities. However, since the Internet and the abundance of data are continuing to grow dynamically, and today's rapidly advancing digital transformation brings with it not only previously undreamt-of opportunities, but also risks, realistically we must assume that the number of complaints will continue to increase.

In handling these future challenges, on behalf of both myself and the Federal Minister of State for Culture, Prof. Monika Grütters, I wish the eco Complaints Office every success and thank the Complaints Office for its valuable work over the past 25 years.

Dr. Günter Winands

Head of Office for the German Federal Government
Commissioner for Culture and the Media

25 Years eco Complaints Office – 25 Years “Together for the Good of the Internet”

**Dear Members of the eco Complaints Office,
Dear Readers,**

2021 is a landmark year for the eco Complaints Office: For 25 years, eco has been advocating for and promoting the responsible use of the Internet and digital technologies. Above all, the fight against illegal and youth-endangering Internet content has always been a priority for eco. In keeping with this year’s anniversary motto, “Together for the Good of the Internet,” the foundation stone for the eco Complaints Office was laid back in 1996 with the establishment of the working group then known as the Internet Content Task Force (ICTF).

Since that time, working primarily on a self-financed basis and alongside our members, we have been successfully fighting illegal content on the Internet and, as such, have extremely well-grounded expertise. As an association of the Internet industry, the milestone which we are celebrating this year is pivotal in continuing to actively strengthen trust in digital technologies and in thus making a responsible contribution to our society.

The year 2021 continues to harbor many uncertainties concerning the ongoing course of the pandemic, meaning that we are likely to primarily meet online for the wide array of activities planned for our anniversary. However,

we won’t be swayed by this in any respect, given that the eco Complaints Office’s very foundation is that of global connectivity and international cooperation via the Internet. If there is one thing that the past year has clearly shown us, it is that a good, trustworthy Internet is the very basis of our communication. The Internet and the stability of digital infrastructures have done so much in preventing the crisis from hitting us much harder. In our anniversary year, we are working with our members, partners, and supporters to show how a good form of digitalization can succeed on a “hand-in-hand” basis. Because it is up to us to use digital services and technologies in such a way that as many people as possible can benefit from digital solutions: Together for the Good of the Internet.

Yet the publication of this year’s eco Complaints Office Annual Report constitutes far more than just the official kick-off of our anniversary year; the report is also a testimony to our transparent approach. For the purpose of open communication with society and between all actors, we have been consistently reporting for many years now on our working approach and successes.

The past year also posed enormous challenges for the eco Complaints Office. Staff welfare has always been a high priority for us. An important element of this is that complaints should not be handled in isolation, but that

the team “stands/sits behind you” – in the truest sense of these words. Allowing the Corona pandemic to lead to a reduction in the manifold work of the Complaints Office was simply out of the question for us. However, due to the pandemic, parallel presence in the office had to be reduced as much as possible. New ways of providing support were tried and tested and ultimately found within the team. Cooperation with our network partners also became more digital. Many new ideas and formats were developed. It’s good to see that, ultimately, the content-related cooperation has not been compromised, but that new possibilities have been found – even if these are unlikely to replace the important personal 1:1 contact in the long run.

Contrary to the expectations of many, the number of complaints received did not increase as a result of the Corona pandemic. Nonetheless, with the current Annual Report, the eco Complaints Office looks back on another record year, given that the proportion of justified complaints has grown significantly: with 5,523 cases, we have registered the highest number of justified complaints in the history of the Complaints Office. Compared to the previous year, this is an increase of over 18.67%. At the same time, despite the special circumstances, we were able to successfully take action against prohibited content in 97.7% of cases – worldwide.



Alexandra Koch-Skiba
Attorney-at-Law, Head of eco Complaints Office

In the year under review, a large proportion of justified complaints once again pertained to depictions of the sexual abuse of minors – a topic that also generated particularly high levels of attention in the media and among political actors in 2020. Abuse cases and their depictions were increasingly the subject of media coverage. In Germany, the legislature introduced tougher penalties as well as reporting obligations for social network providers, as part of the amendment to the Network Enforcement Act (NetzDG). In addition, the European Commission launched a new strategy to combat the sexual abuse of minors, the implementation of which includes the question of proactive measures by providers and a further intensification of cooperation between the various actors. In this respect – but also in regard to the amendment of the German law on protection of minors

in the media – the eco Complaints Office has contributed its expertise and industry background, particularly in the context of position statements and consultations – and will naturally continue to actively accompany developments this year.

I am pleased to be able to present the anniversary edition of the eco Complaints Office Annual Report, with numerous more details on our work and statistics for the year 2020. Let's continue this year with our constructive and lively discourse.

Cordially yours

Alexandra Koch-Skiba

Attorney-at-Law, Head of eco Complaints Office

Together for the Good of the Internet – 25 years eco Complaints Office

Important milestones in the 25 years of the eco Complaints Office (1996 – 2021)

1996	Founding of the Internet Content Task Force; support of the participating companies by the Complaints Office Launch of reporting options for Internet users
1999	Founding of INHOPE
2004/2005	Development and launch of www.internet-beschwerdestelle.de
2007	First written MOU with the German Federal Criminal Police Office (BKA) Founding of fragFinn
2008	Founding of the German Safer Internet Centre
2017	First Youth Media Protection Expert Lunch First independent Annual Report
2019	Participation in the project "Prosecute, don't just delete"
2021	25 years eco Complaints Office

Dorothee Bär

Member of the German Bundestag, Minister of State in the Federal Chancellery and Federal Government Commissioner for Digitalization

"When it comes down to politics and business, but also to society as a whole – meaning each and every user: we all shoulder joint responsibility for ensuring well-being on the Internet and interacting with each other fairly, democratically and legally. That is why the anniversary motto of the eco Complaints Office could not be more fitting: Together for the Good of the Internet."



Renate Künast

Member of the German Bundestag, Bündnis90/The Greens

"Congratulations on your 25th anniversary! I am pleased that you have been fighting for so long and so persistently against hate on the Internet, including for the rights of users. The Internet is a place that enables us to create knowledge and transparency, to exchange ideas and form opinions. But it is also a place that some people exploit in an orchestrated and organized manner for hate purposes. Let's keep fighting together to achieve a solid legal framework for this."



Thomas Jarzombek

Member of the German Bundestag, Commissioner of the Federal Ministry for Economic Affairs and Energy for the Digital Economy and Start-ups

"Each day sees all of us benefit from the positive aspects of the Internet. Unfortunately, however, the Internet is also being exploited for abusive purposes. For 25 years now, the eco Complaints Office has been combatting illegal content hand-in-hand with its partners. I would particularly like to thank the team members who investigate the numerous complaints every day; to thank them for the tough work that they undertake for the good of the Internet: work which is often difficult to endure, but which is so important!"

**Nadine Schön**

Member of the German Bundestag, Deputy Chair of the CDU/CSU Parliamentary Group in the Bundestag

"For so many people, the Internet has become a place of hope, a refuge, a place of communication and social exchange. But of course we also recognize the dangers of the Internet: cybergrooming, cyberbullying, disinformation campaigns, filter bubbles, hate speech and incitement. And it goes without saying that we want to tackle this. For this reason, in recent years, as we have become more and more active on the Internet, mechanisms have been developed to combat these negative tendencies, to counteract them. And of course the eco Complaints Office plays a very important role here. A heartfelt thank you for the invaluable work over all these years!"

**Lars Klingbeil**

Member of the German Bundestag, SPD General Secretary

"The Internet creates numerous opportunities, one of which is to discuss politics. We can contribute ideas, inform ourselves, argue, speak our minds. However, freedom of expression reaches its limits when an 'expression' defames, incites, sows hatred, or propagates false information. The fight against illegal Internet content is a task for society as a whole. The eco Complaints Office has stood as a model for this – for 25 years now."

**Tankred Schipanski**

Member of the German Bundestag, Spokesperson on Digital Affairs for the CDU/CSU Parliamentary Group

"The Internet offers an incredible amount of opportunities for our digital society. It brings people together, it connects people, and of course it offers numerous opportunities for shared communication and shared experiences. More and more of real life is shifting to the Internet – whether it's to do with business, with shopping, and especially when it comes to communication. Maintaining that wealth of information and communication opportunities, but also the economic opportunities, is of the utmost importance."



1. eco Complaints Office: Who we are and what we do

Dedicated to combatting illegal content on the Internet

The eco Complaints Office (complaints-office.eco.de) has been fighting illegal content on the Internet since 1996. It is embedded in the system of regulated self-regulation and has, in particular, the task of improving and promoting youth protection on the Internet.

Currently, seven staff members with a legal background work in the eco Complaints Office team: the Head of the Complaints Office, three Consultants, and three Content Analysts.

Internet users can make a free and anonymous report on youth-endangering and prohibited content at complaints-office.eco.de or www.internet-beschwerdestelle.de/en/index.html (a joint portal operated by eco and FSM), or can contact the eco Complaints Office via email at hotline@eco.de. In addition, the eco Complaints Office is a partner of the information platform for young people, jugend.support,

and processes reports submitted there together with the complaints offices (on an international level also known as hotlines) of the FSM and jugendschutz.net.

In order to effectively fight illegal online content, cooperation with other relevant players is essential. The eco Complaints Office therefore cooperates with, among others, providers, partner hotlines, and law enforcement agencies. eco is also a founding member of the International Association of Internet Hotlines (INHOPE), an international network that supports hotlines worldwide. eco is also part of the German Safer Internet Centre.

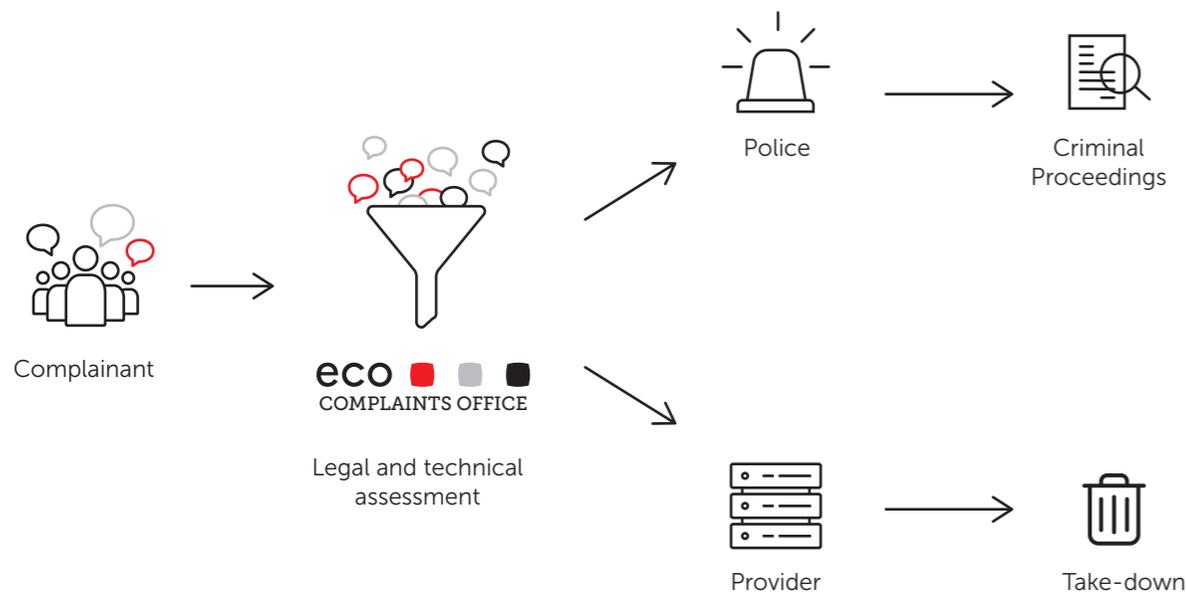
In all of this, the eco Complaints Office serves as a model for neutral and transparent processes and acts as the contact partner for association members, the state, society, and politics.

1.1 Simply and anonymously: Submitting a complaint

The eco Complaints Office accepts complaints regarding all Internet services: the world wide web, emails, file-sharing, chats, newsgroups, discussion forums, and mobile content. The content can be hosted on servers either within or outside of Germany (the home country

of the eco Complaints Office), and can be reported by any Internet user. The provision of personal data is optional, which also allows the report to be made anonymously.

Reporting illegal Internet content to the eco Complaints Office



1.2 What kind of illegal content does the eco Complaints Office deal with?

Incoming complaints initially undergo a comprehensive legal assessment. The eco Complaints Office’s assessment standard concentrates on youth media protection and related criminal offenses. In particular, in the course of this, the eco Complaints Office handles complaints related to the following illegal Internet content:

In addition, the eco Complaints Office handles reports on the unsolicited sending of marketing emails and newsletters.

You can find further information and definitions of the various offenses at:

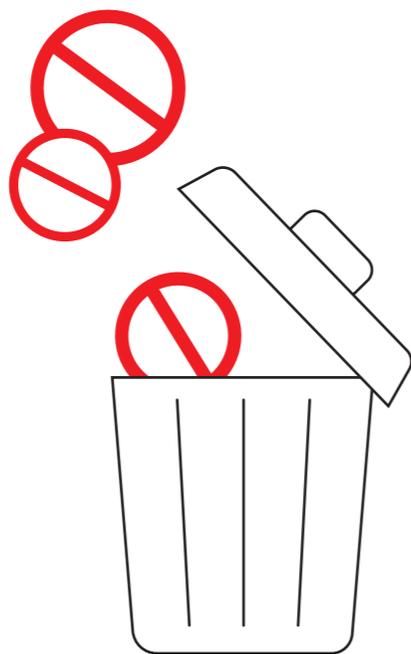
<https://go.eco.de/eco-Complaints-Office-Legal-Basis>

- Sections 4, 5 German Interstate Treaty on the Protection of Minors in the Media (JMStV), youth-endangering and development-impairing content as well as the corresponding criminal regulations:
- Section 184 et seq. German Criminal Code (StGB), freely accessible adult pornography, pornography depicting violence, animals, children, or juveniles
- Section 86, 86a StGB, dissemination of symbols and propaganda material of unconstitutional organizations
- Section 130 StGB, incitement of the masses
- Section 130a StGB, attempting to cause the commission of offenses
- Section 131 StGB, depictions of extreme violence
- Section 176 StGB, grooming
- Section 201a StGB, dissemination of naked images of minors for profit
- Section 111 StGB, public incitement to crime

1.3 “Take-down instead of blocking”: Self-regulation rather than Internet censorship

In the fight against prohibited web content, complete “take-down” of content from the Internet is the core and most effective approach. The method is not only fast, but also effective and long-lasting. This is why the eco Complaints Office has pursued this approach from the very beginning.

The Internet industry’s self-regulation mechanisms for the fight against unlawful online content work very well at both the national and international levels.



1.4 Measures taken by the eco Complaints Office

After a thorough assessment of the content, action is taken depending on the severity of the offense and the location of the server (in Germany or in other countries):

Punishable content hosted in Germany is always reported to the authorities. In addition, the Complaints Office asks that the hosting provider makes the relevant data available to the law enforcement agency on request and takes appropriate measures to prevent further access to the illegal content.

Should **absolutely prohibited Internet content** be hosted in Germany, the eco Complaints Office asks the hosting provider to take the content down (disconnect). For other **youth-endangering or development-impairing content**, the provider will be required to ensure that the content is made legally compliant (for example, through implementation of an age verification system).

Content hosted abroad is initially forwarded to the appropriate INHOPE partner hotline. This hotline then takes over the further processing of the complaint, with the objective of removal or legalization of the content, and also works “locally” with the responsible law enforcement agency. If there is no INHOPE member in

the country where the server is located, or if the content reported does not fall within the mandate of the INHOPE partner hotline, eco will contact the hosting provider directly.

In addition to this, criminal content hosted abroad is also reported to the authorities, if the given content is punishable internationally or is subject to universal jurisdiction as foreseen in the German Criminal Code. According to this principle, German criminal law is applicable in certain cases where the respective offense has no direct connection to Germany. However, in such cases the offense must be committed against internationally protected legal interests, for example cases of Child Pornography content or violations of international law.

On each working day, the eco Complaints Office monitors any continued availability of the reported content. If necessary, the provider will be asked again to remove or legalize the reported content.

Complainants who have provided a return address will be briefly informed of the outcome of the legal assessment.

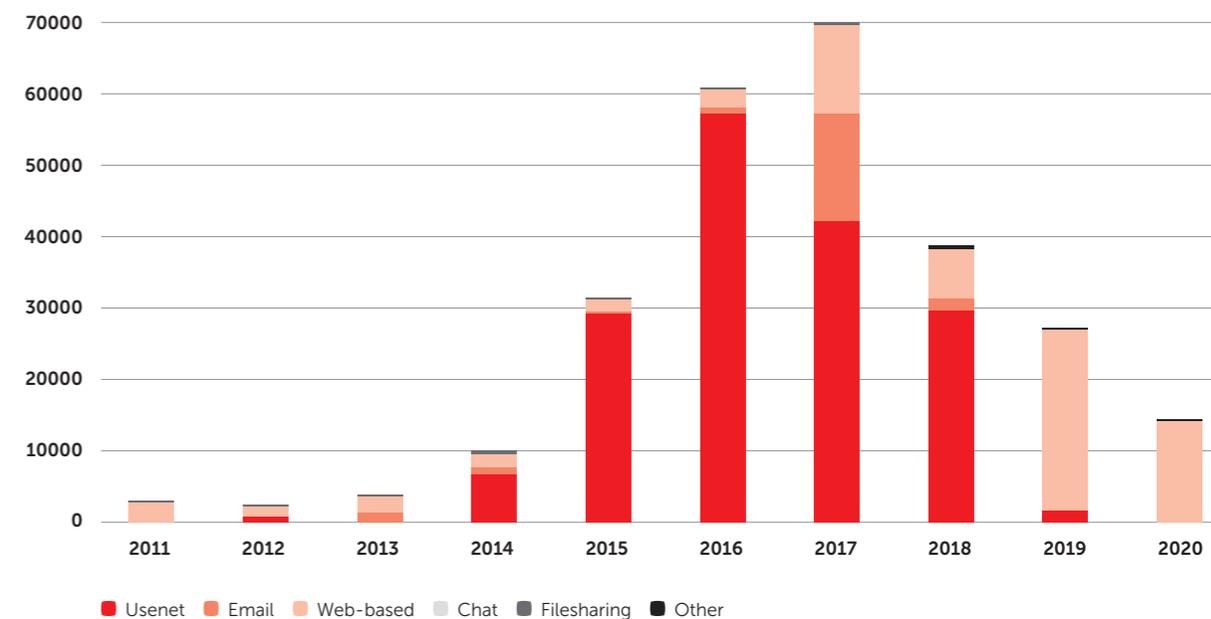
2. Complaints 2020: Facts and Figures

2.1 Number of complaints and measures taken in 2020 in the field of youth media protection

Many people expected an increase in reports on illegal Internet content in 2020 due to the Corona pandemic. Contrary to this assumption, the eco Complaints Office did not register an increase in reports in the reporting year: A total of 14,420 complaints were reported re-

garding potentially criminal content or content relevant to youth media protection of minors. Nevertheless, the number of justified complaints, with a total of 5,523 cases, is higher than ever before.

Total Growth in Numbers of Complaints in the Field of Youth Media Protection



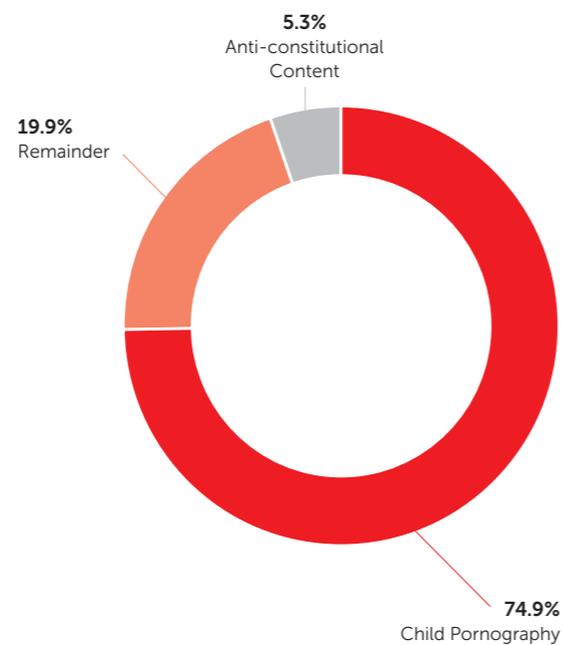
Source: eco Complaints Office, 2021

As in previous years, a large proportion of the complaints received (11,012 cases) related to depictions of the sexual abuse and sexual exploitation of minors, in particular depictions that were legally classified as Child Pornography* as defined in Section 184b of the Criminal Code. The number of reports on anti-constitutional content (759 cases) decreased slightly compared to the previous year and is roughly at the same level as 2018. Reports on freely-accessible adult pornography (1,149 cases), on the other hand, increased significantly compared to the previous year and were also at the same level as 2018.

Almost 40% of the complaints received in the reporting year were actionable by the eco Complaints Office ("justified complaints"). A complaint is considered as justified if a violation of the law is detected, and measures are taken subsequent to an assessment. As a matter of prin-

ciple, measures are taken for every violation of the law unless the eco Complaints Office is reasonably confident that the necessary measures have already been taken

Breakdown of Complaints Received Excluding Spam



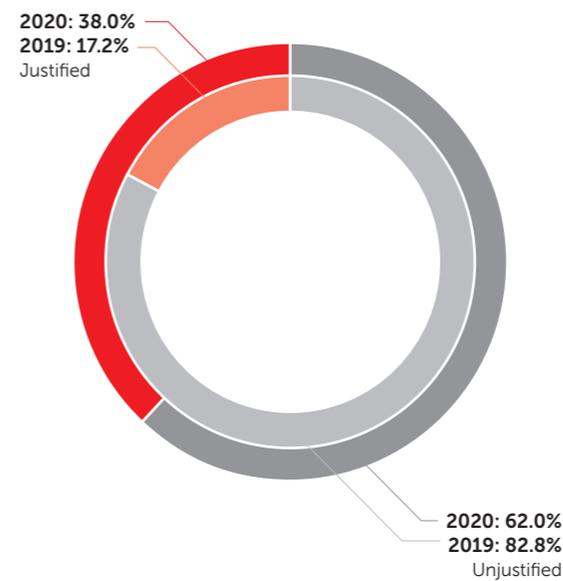
Source: eco Complaints Office, 2021

* In the Annual Report, this "terminus technicus" of the legal text is used when referring to depictions of abuse of children as defined in Section 184b of the German Criminal Code (StGB). This is not intended as an explicit endorsement of the terminology, but serves solely to differentiate between the individual offenses in the field of depictions of sexual abuse and sexual exploitation of minors. Capitalized terms such as Child Pornography are terms derived directly from German law.

(e.g. reporting to the police and to the eco Complaints Office in one email, knowledge of measures taken by partner hotlines, duplicate reports, etc.).

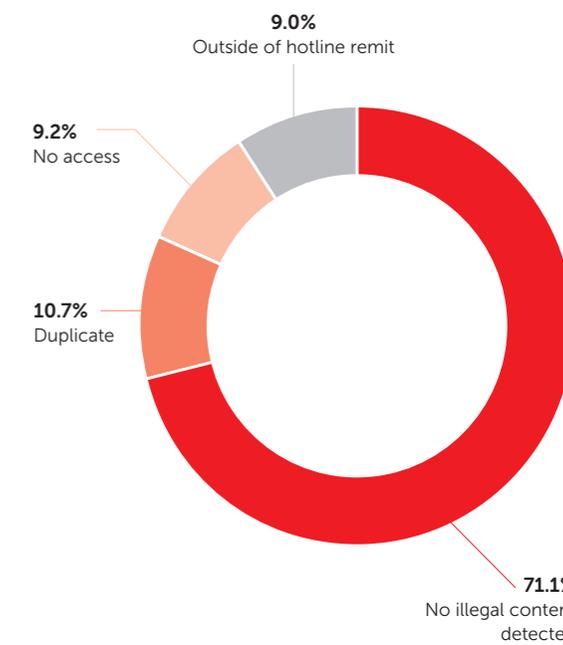
This means that the proportion of justified complaints increased by around 18.7 percentage points compared to the previous year.

Proportion of Justified Complaints 2020 Compared to 2019 (Excluding Spam)



Source: eco Complaints Office, 2021

Unjustified Complaints 2020 in Detail



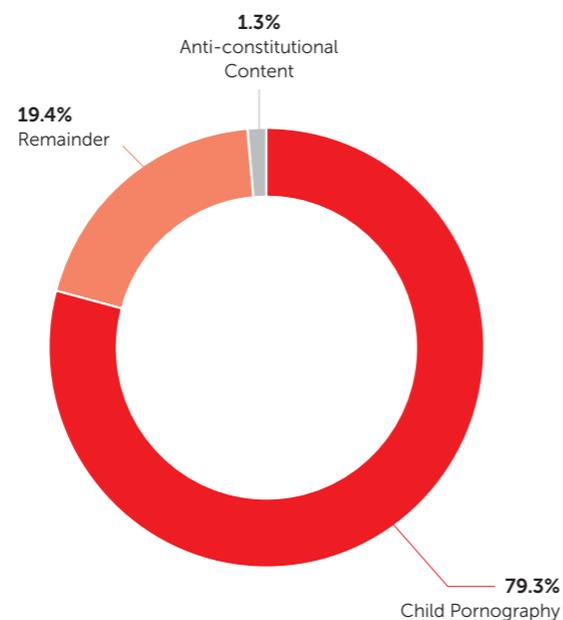
Source: eco Complaints Office, 2021

With 5,523 cases, in 2020 the eco Complaints Office consequently registered the highest number of justified complaints in its history. Compared to the previous year (2019: 4,654 cases), the number of justified complaints increased by 18.7%. The principal reason for this is that the proportion of justified complaints has grown in comparison to previous years.

As in previous years, a large proportion of the justified complaints concerned content that is accessible via websites of all kinds (web-based content).

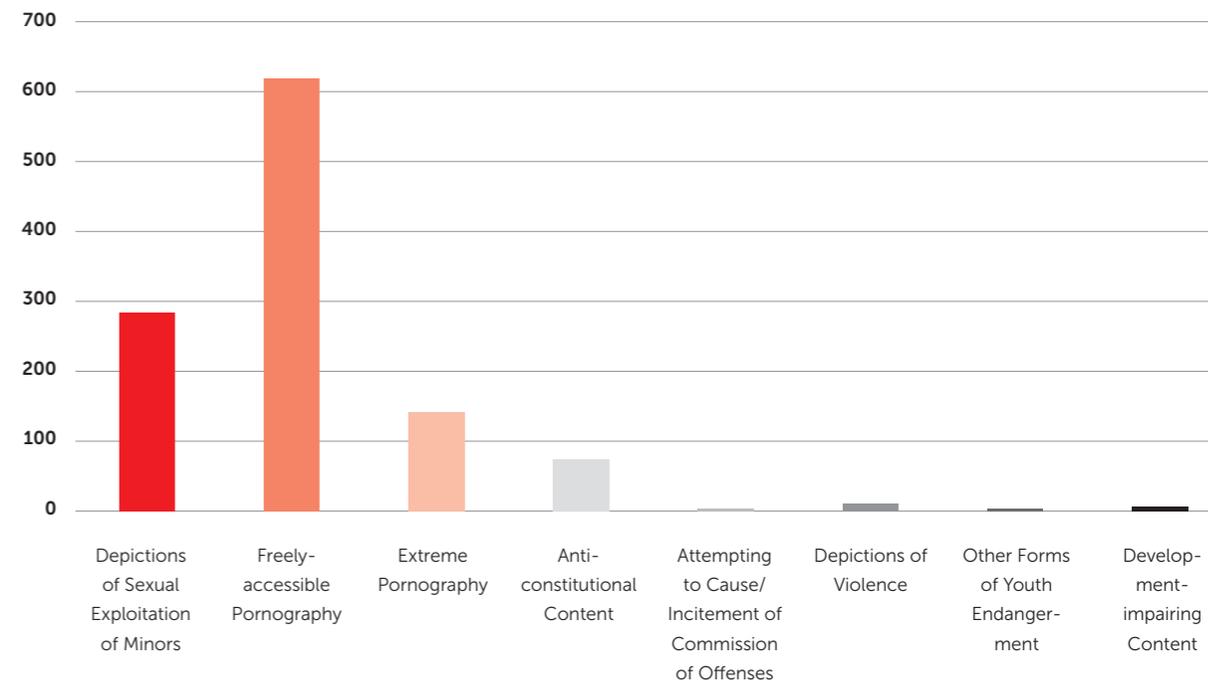
In terms of content, Child Pornography content also – as in previous years – accounted for the largest share of justified complaints.

Justified Complaints 2020 (Excluding Spam)



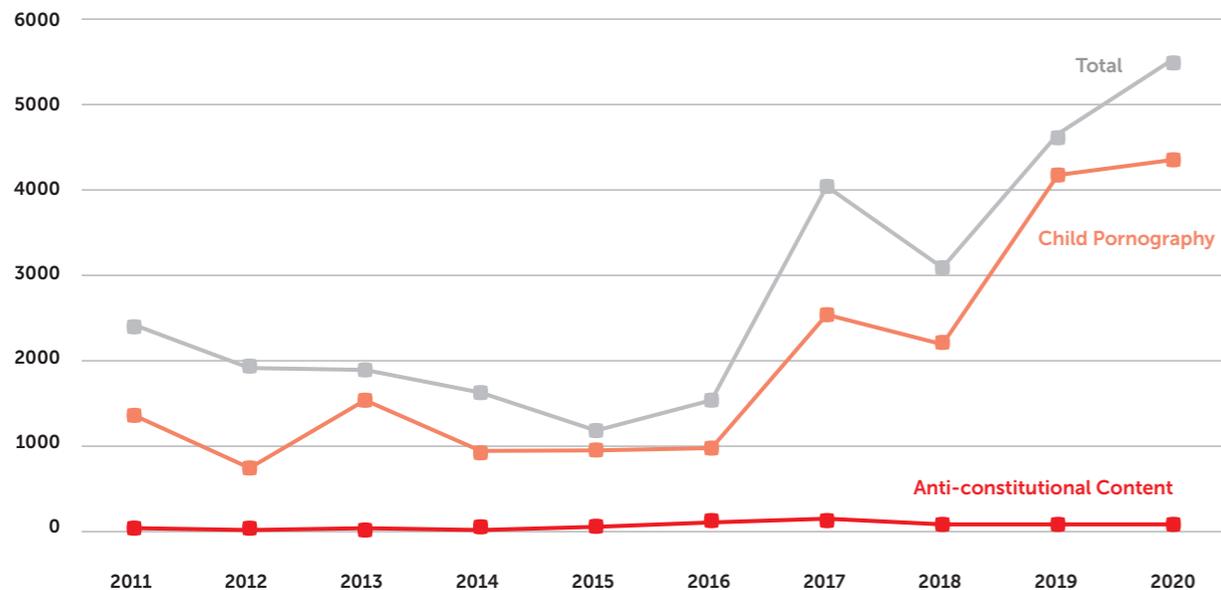
Source: eco Complaints Office, 2021

Justified Complaints 2020 (Excluding Spam, Excluding Child Pornography)



Source: eco Complaints Office, 2021

Growth in Number of Justified Complaints

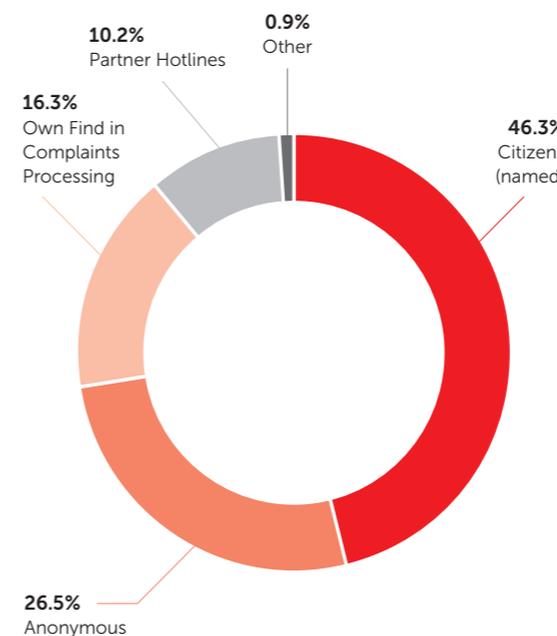


Source: eco Complaints Office, 2021

Once again, it has been proven that it is important to have the option to report illegal content anonymously. Compared to the previous year, the proportion of

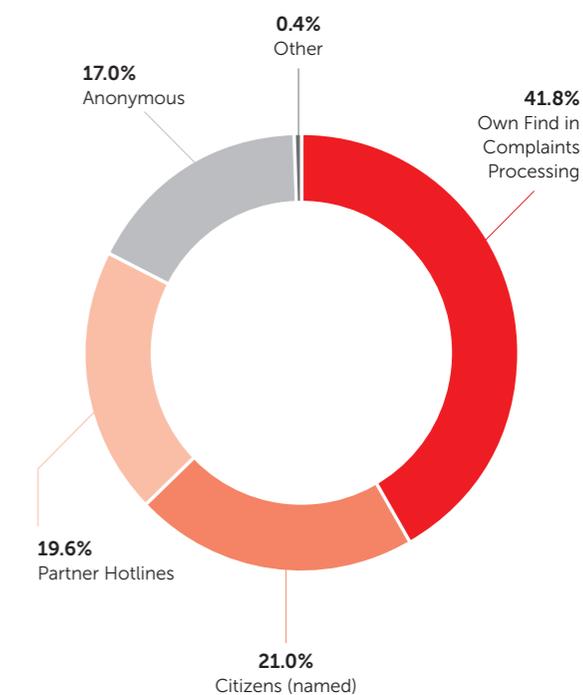
anonymous reports received increased by about 11 percentage points to 26.45%.

Reporters of the Received Complaints (2020)



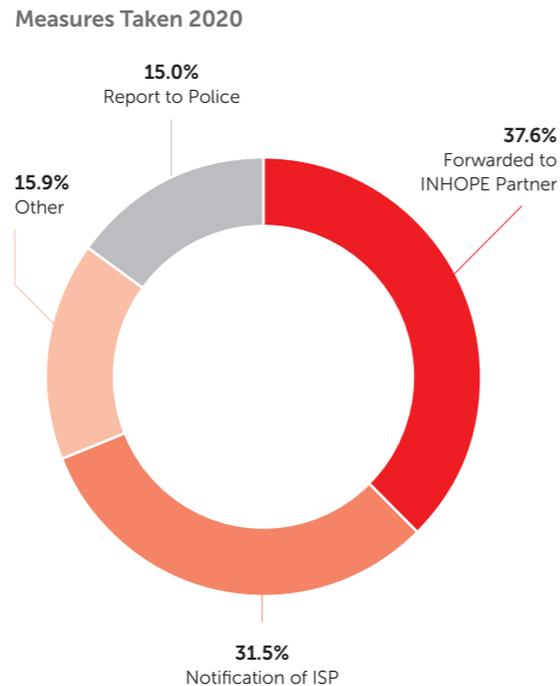
Source: eco Complaints Office, 2021

Reporters of Justified Complaints (2020)



Source: eco Complaints Office, 2021

Last year, the eco Complaints Office sent a total of 9,080 notifications (in particular to the police, INHOPE partner hotlines, and/or ISPs – not including reminders). In so doing, the relatively low proportion of reports sent to the police is due to the fact that, in cases of depictions of abuse of children on content hosted abroad, a report is generally only made to the German Federal Criminal Police Office (BKA) if no INHOPE partner hotline exists. If, on the other hand, an INHOPE member can be contacted who in turn informs the law enforcement agencies, no report is generally made to the German Federal Criminal Police Office (BKA) in order to avoid duplication of work.



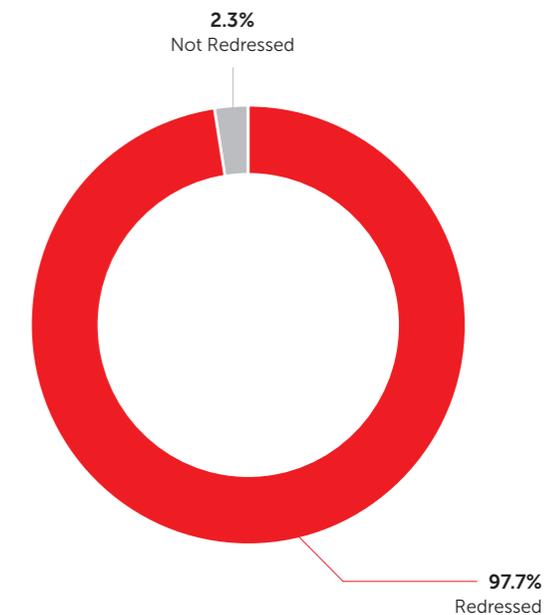
Source: eco Complaints Office, 2021

2.2 Success rate for web-based content

The success rate for web-based content has risen slightly compared to the previous year: 97.7% of the content reported upon by the Complaints Office was taken down or otherwise legalized (e.g. through the implementation of an age verification system); in around 36% of these cases, the reported URL was initially moved to another provider (so-called "moved cases").

This demonstrates that self-regulation works, also internationally, given that less than one fifth of the reported URLs (16.9%) were hosted in Germany.

Total Success Rate for Web-based Content 2020

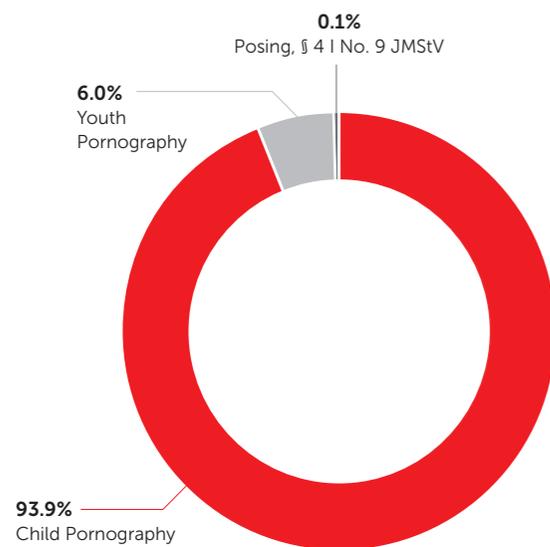


Source: eco Complaints Office, 2021

2.3 Complaints about depictions of the sexual abuse and sexual exploitation of minors (CSEM) in detail

The number of justified complaints regarding depictions of the sexual abuse and sexual exploitation of minors increased by around 6% in 2020. Of the total of 4,664 cases from this area of offense, the majority, as in previous years, were regarding content that qualified as Child Pornography as defined in Section 184b of the German Criminal Code.

Justified Complaints of CSEM in Detail (2020)

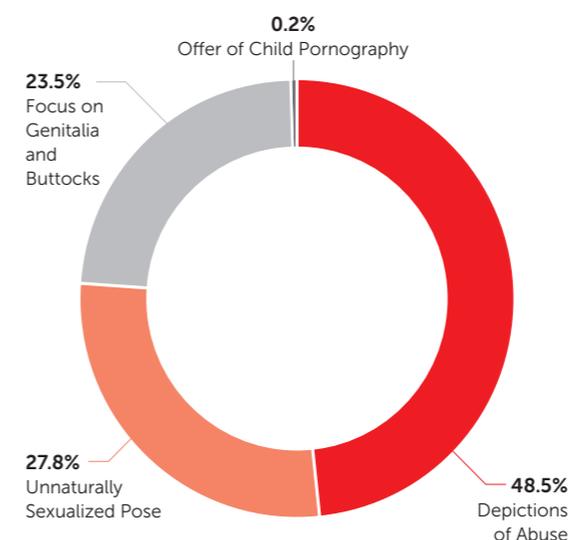


Source: eco Complaints Office, 2021

Since January 2015, the offense of Child Pornography makes provision for three different variants: depictions of sexual abuse of children, images of partially or completely naked children in an unnaturally sexualized pose, and the sexually provocative reproduction of the naked buttocks or genitalia of children. 48.47% of justified Child Pornography complaints in 2020 concerned the first variant (depictions of the sexual abuse of children). Compared to the preceding years, this is a reduction of around 15 percentage points and thus roughly corresponds to the proportion from 2018.

There was consequently a difference compared with previous years with regard to Posing, and especially in relation to depictions that focused on the genitalia or buttocks. Posing is defined as images of minors in an unnaturally sexualized pose. According to German law, such content must not be disseminated online. Depending on the age of the person shown and the kind of depiction, Posing may represent purely an infringement of media law (Section 4 (1) 9, German Interstate Treaty on the Protection of Minors in the Media (JMStV)), or is punishable as Child Pornography or Youth Pornography (Section 184b (1) 1b and Section 184c (1) 1b, German Criminal Code).

Content Qualified as Child Pornography in Detail (2020)



Source: eco Complaints Office, 2021

In 2020, approximately a quarter of the justified complaints in the area of depictions of the sexual abuse and sexual exploitation of minors concerned Posings, which constituted a slight increase compared to the previous year.

2.3.1 Notable challenges in 2020

From a technical viewpoint, referrer cases and the use of Content Delivery Networks (CDNs) are particularly noteworthy:

Depictions of the sexual abuse and sexual exploitation of minors are not infrequently only accessible with a so-called referrer. Here, the user must come from a specific "source" site, which refers across through a link. The "destination" site registers where the user has come from and shows different content depending on the request. Technically, this process can be simulated using particular tools. A more complex, but comparable, method triggers this technical path-setting through the use of cookies. In both cases, different content will be shown depending on the digital path followed or simulated.

The involvement of Content Delivery Networks (CDNs) also makes it more difficult to process cases – for example, in instances where there is a delay in reporting

back to the actual host provider, or when the take-down check before a reminder is sent requires a renewed response from the CDN to identify the actual host provider. Occasionally, explanations to the recipient also require a notification that a CDN is involved.

It is also worth drawing attention to tracing peculiarities that emerged in relation to a platform abused for the distribution of illegal content. In this respect, the staff of the eco Complaints Office had to deal with the phenomenon that the particular tracing result was location-dependent. For example, when tracing out of Germany, Russia was used as the server location and vice versa. Within the INHOPE network, this also led to increased communication outlay. In the end, in these cases, the illegal content could be taken down through direct contact with the platform provider.

Legally, the boundary between the different varieties of offense in relation to Child Pornography as defined in Section 184b of the German Criminal Code and the boundary between Child Pornography and other relevant regulations in the area of images of the sexual abuse and sexual exploitation of minors frequently poses challenges, especially with regard to statistical recording. Particular examples which should be mentioned here relate to an assessment of the age of a child, and the

distinction between images of children in an unnaturally sexualized pose and the sexually provocative reproduction of the unclothed genitalia or the naked buttocks of a child.

A further challenge is presented by the different legal situations of countries; in particular, there are international differences in the area of Posing, virtual or text-based Child Pornography, and cases of links to Child Pornography material.

Contrary to the norm, in one case of a provider with a German server location, an increased degree of communication effort was required before the reported content was removed. In addition, there were a small number of host providers from abroad who consistently ignored notices from the eco Complaints Office (and from other hotlines) or who were extremely slow in acting upon them, regardless of the content involved.

The receipt of mass reports, i.e. the notification of a large number of URLs in one report, also poses a particular challenge. In the instance of a mass report, the otherwise usual distribution of received reports is not possible, as reported content must be reviewed and classified within a very short time. This means that mass reports require considerable human and technical resources,

which means that other complaints received can only subsequently be processed.

More often than in the past, certain content (such as with file hosting services) could only be accessed with a so-called premium account. The platform operators concerned did not always provide the eco Complaints Office with a corresponding account free of charge. In these situations, in some cases the cooperation within the INHOPE network made it possible to review the reported content.

In 2020, in a few isolated cases, the eco Complaints Office also found that distributors of illegal content switched to hosting countries where there is not yet an INHOPE partner hotline, especially after take-down by the original provider. To some extent, this has made it more difficult to make contact and submit requests for take-down.

2.3.2 Overview of the reaction times for web-based Child Pornography cases

It should be borne in mind when considering the following figures and graphs on reaction times for Child Pornography web content, as well as for Posing cases, that these do not necessarily represent the effective or actual reaction time of the Internet service provider,

but rather the time from eco receiving the report until verification by eco of take-down. Here, the frequency of checks to ascertain take-down also influences the reaction times. The more often checks are made to see whether the content has been taken offline, the more exact and conclusive statements regarding reaction time are. The eco Complaints Office checks for take-down

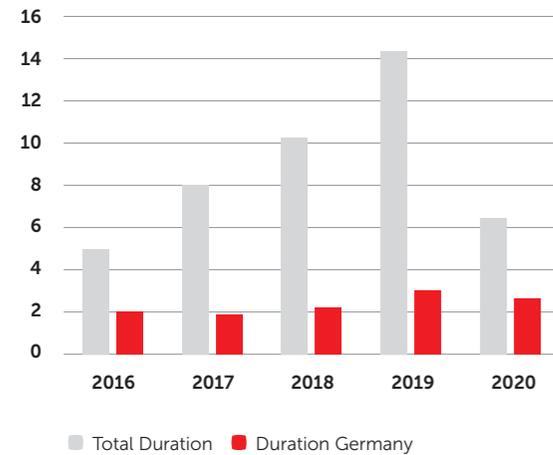
as a rule on week days, and does not remove weekends and public holidays on which eco does not work from the calculation of the accessibility and success rates.

In comparison to previous years, shorter take-down times were registered in 2020. Websites with Child Pornography hosted in Germany were offline ("taken down") within 2.43

days on average, whereas globally it took 6.44 days.

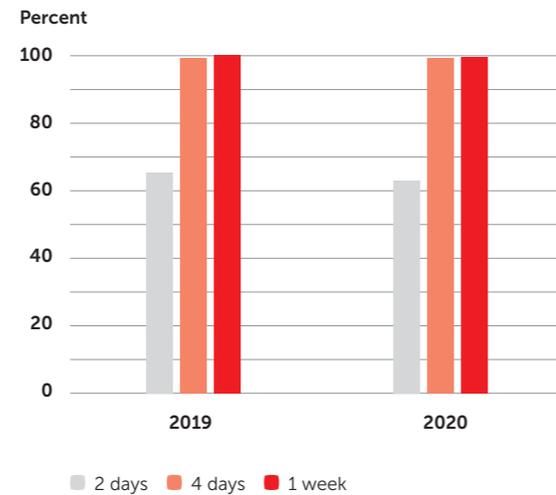
For Child Pornography content overall, a total success rate of 98.79% was recorded (for content hosted in Germany, this came to 100%). Overdue (as well as delayed) take-downs were primarily caused by different legal situations with regard to texts, virtual depictions, and links.

Average Duration until Take-Down in Annual Comparison (Child Pornography)



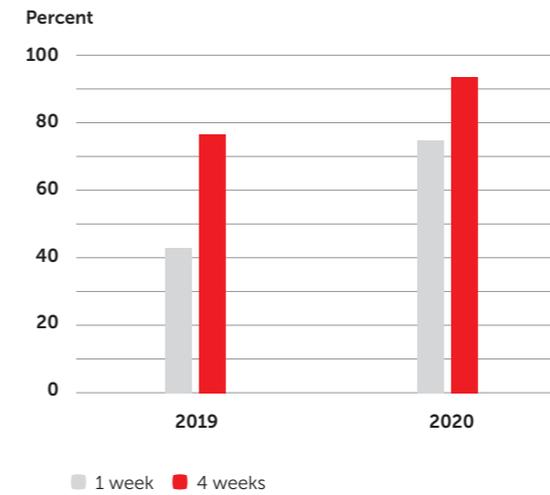
Source: eco Complaints Office, 2021

Take-Down Rates Child Pornography (German Cases)



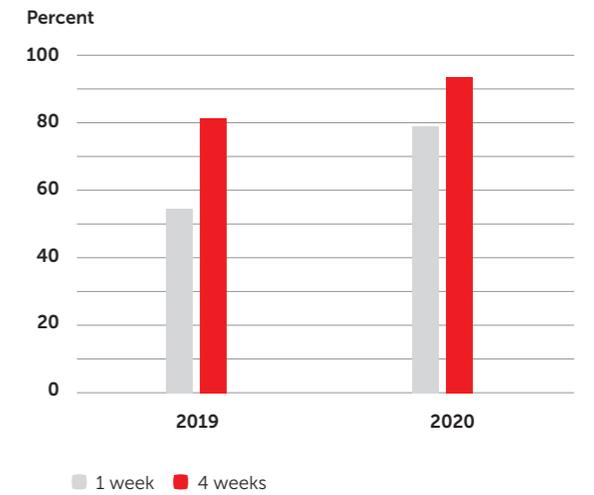
Source: eco Complaints Office, 2021

Take-Down Rates Child Pornography (Outside of Germany)



Source: eco Complaints Office, 2021

Take-Down Rates Child Pornography (All Cases)



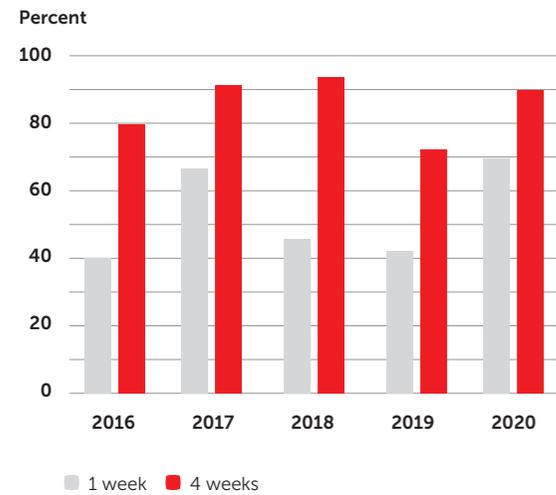
Source: eco Complaints Office, 2021

2.3.3 Overview of reaction times for web-based Posing cases

As in the previous year, the take-down times of so-called Posing of minors did not differ significantly from the take-down times for images of the sexual abuse of

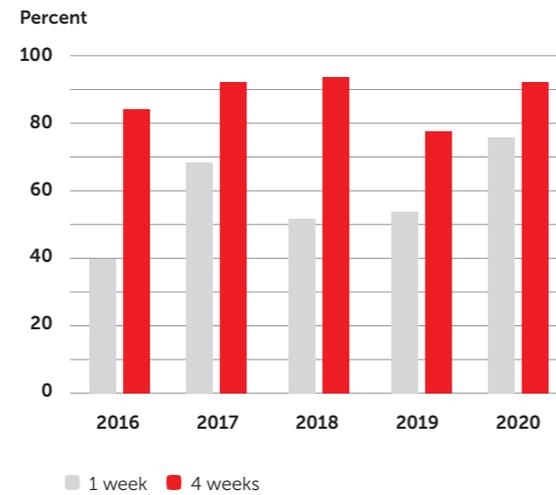
children. Worldwide, it took on average 7.64 days from the report being submitted to eco until the content had disappeared. Content hosted in Germany was no longer available on average after 2.19 days. (These figures also include public holidays and weekends.)

Take-Down Rates Depictions of Posing (Outside of Germany)



Source: eco Complaints Office, 2021

Take-Down Rates Depictions of Posing (All Cases)



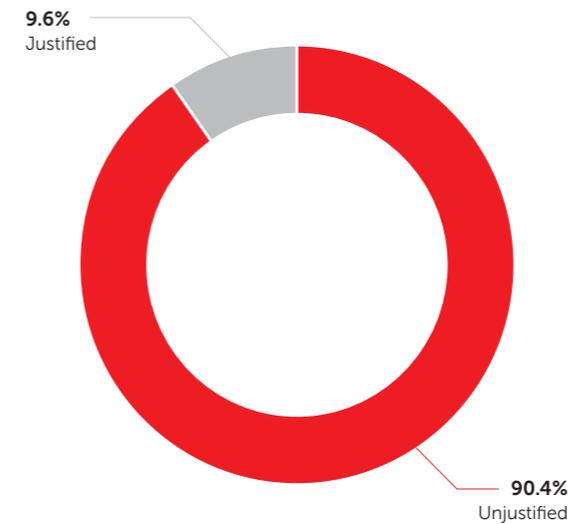
Source: eco Complaints Office, 2021

2.4 Complaints about anti-constitutional content in detail

In 2020, the proportion of justified complaints in this offense sector was also strikingly low. In the end, just 9.62% of the potentially anti-constitutional content

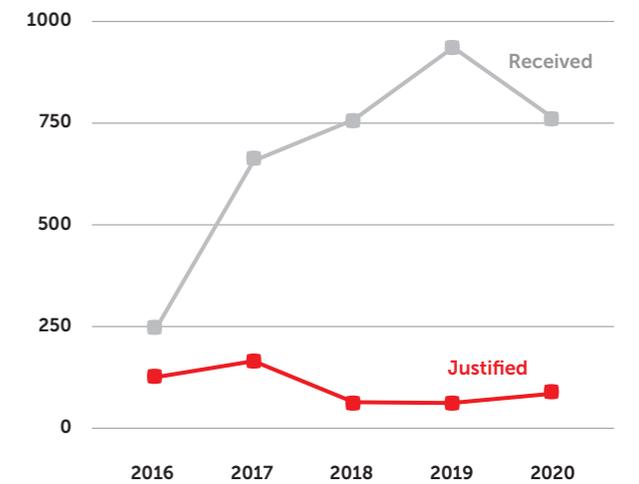
reported to the eco Complaints Office had to be or could be classified as illegal content.

Proportion of Justified Complaints about Anti-Constitutional Content 2020



Source: eco Complaints Office, 2021

Proportion of Justified Complaints on Anti-Constitutional Content (Comparison 2016–2020)

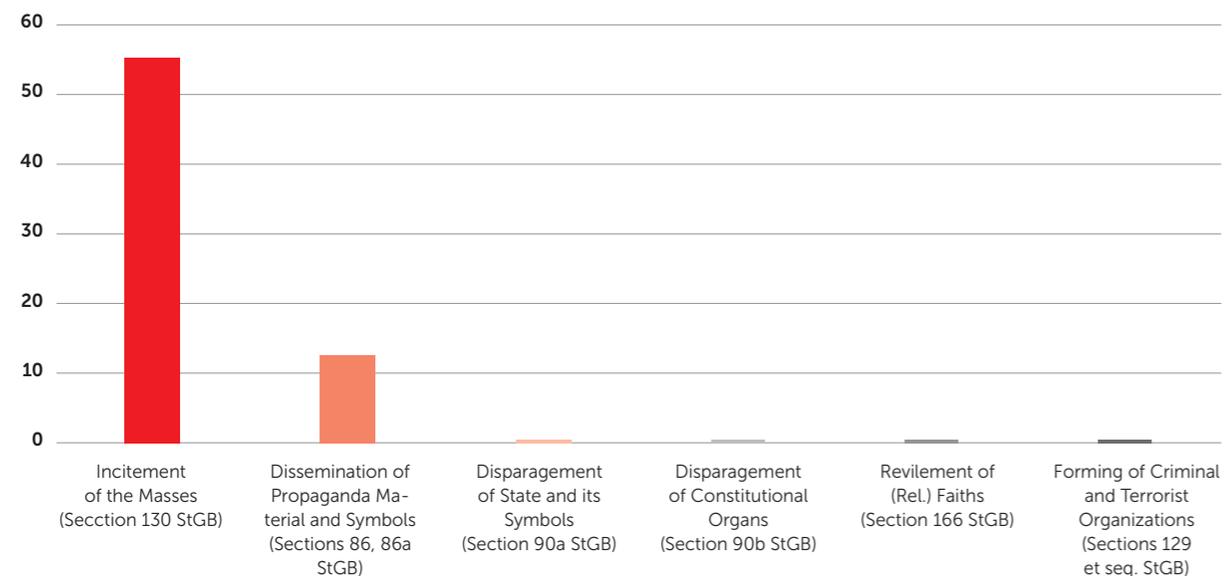


Source: eco Complaints Office, 2021

This makes it clear that complainants in this area of offense are extremely sensitized to possible legal infringements. At the same time, it is clear that the legal hurdles for actual violations are high, especially as a result of freedom of expression. This again serves to

prove how important a thorough – and at times also a time-consuming – assessment of the content is, so that freedom of expression can be ensured within the framework of existing law, and that permissible statements are not simply deleted as undesirable.

Justified Complaints on Anti-Constitutional Content in Detail 2020 (total)



Source: eco Complaints Office, 2021

In 2020, 1.32% of justified complaints (73 cases) could be categorized within the area of “anti-constitutional content” (in the broad sense): incitement of the masses (Section 130 StGB), dissemination of propaganda material of unconstitutional organizations (Section 86 StGB), use of symbols of unconstitutional organizations (Section 86a StGB), disparagement of state and denigration of symbols (Section 90a StGB), disparagement of constitutional organs (Section 90b StGB), forming of criminal and terrorist organizations (Sections 129 et seq. StGB), and revilement of religious faiths (Section 166 StGB). The relevant cases reported to the eco Complaints Office concerned a wide range of services. Around three quarters of the complaints were attributed to the area of incitement of the masses.

Over three quarters of the actionable cases were clear violations, whereas in the other cases (13.7%) an intensive legal assessment was required.

2.4.1 Overview of the reaction times for web-based anti-constitutional content

In total, in the year under review 70.15% of the anti-constitutional content reported by the Complaints Office was taken down. Compared to the previous year, this represents a reduction of around 14 percentage points and corresponds approximately to the success rate from 2018.

At this point, it should also be emphasized that only one case of reported content was hosted in Germany. In contrast to depictions of the sexual abuse of children, incitement of the masses and other racist content is not equally prohibited around the world. In terms of their bases, a wide divergence exists in the legal situations. Despite this, in a good three quarters of cases, success (=redress) could be achieved, because the hosting provider mostly took measures on the basis of prevailing law or the company’s own T&Cs. In addition, there were some cases in which we were asked by the law enforcement agencies not to notify the host provider for investigative tactical purposes. This also had a slight impact on the success rate in the year under review.

In comparison to depictions of the sexual abuse of children, the take-down times for anti-constitutional

content are relatively long. In the year under review, it took an average of 10.13 days until the content in question was no longer available (including weekends and public holidays). One reason for this is the different legal situations in the various countries, which result in a

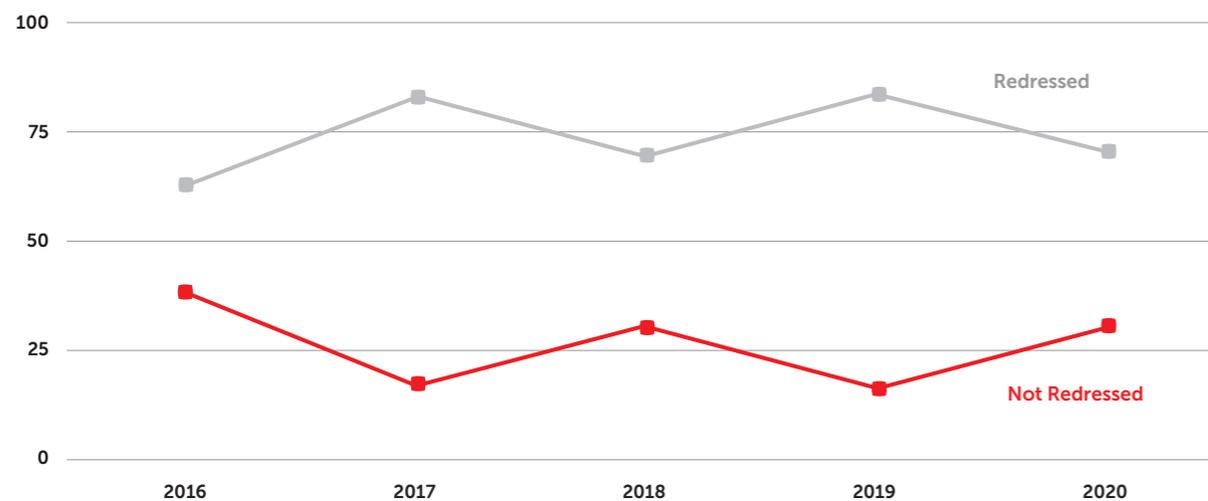
greater need for coordination, and which can thus have an influence on the take-down times.

Overall, the fact that the eco Complaints Office must take account of a longer waiting period between the

report being made to the police and the ISP (3 working days) also has an impact. In addition, complaints about depictions of the sexual abuse and sexual exploitation of minors are accorded priority, given that the possibility is always present of the law enforcement agencies identifying the victim or perpetrator, which means that

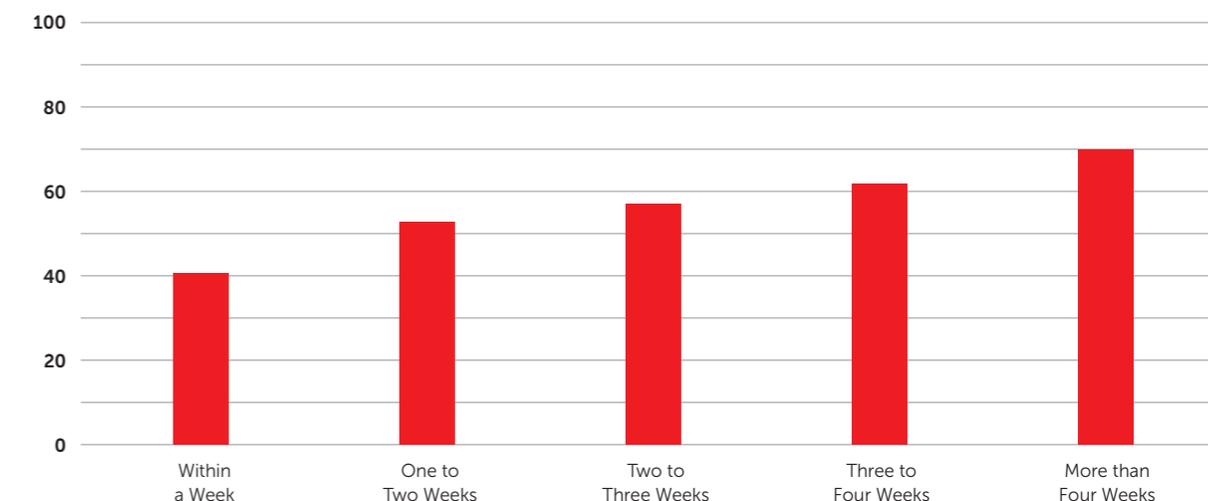
further abuse can be prevented. At times when a high receipt of reports of depictions of sexual abuse and sexual exploitation of minors occurs, this can lead to delays in checking take-down times for other offense sectors, rather than these being checked at the usual frequency interval rate.

Success Rates for Anti-Constitutional Content 2016–2020



Source: eco Complaints Office, 2021

Success Rates for Anti-Constitutional Content from Time of Notification 2020 (All Cases)



Source: eco Complaints Office, 2021

2.5 Complaints about unsolicited advertising emails

The eco Complaints Office also follows a self-regulatory approach when it comes to the processing of complaints about the impermissible sending of advertising emails and newsletters. The senders of such emails are informed of the legal requirements for permissible email advertising – with a request for compliance. If required, addressing the provider used for the sending of emails can be a sensible measure, in which case the provider can take further measures, e.g. in the case of spam being sent via a botnet or by senders who do not immediately respond appropriately.

In the case of complaints about the impermissible sending of advertising emails and newsletters that pertain to one of the senders certified by eco as part of the Certified Senders Alliance (CSA), more intensive processing of

the complaint occurs. If the complainant mandates this, a comprehensive consideration of the facts takes place (in particular regarding data collection), and in the case of non-compliance with the CSA regulations, measures are taken to ensure compliant sending in future.

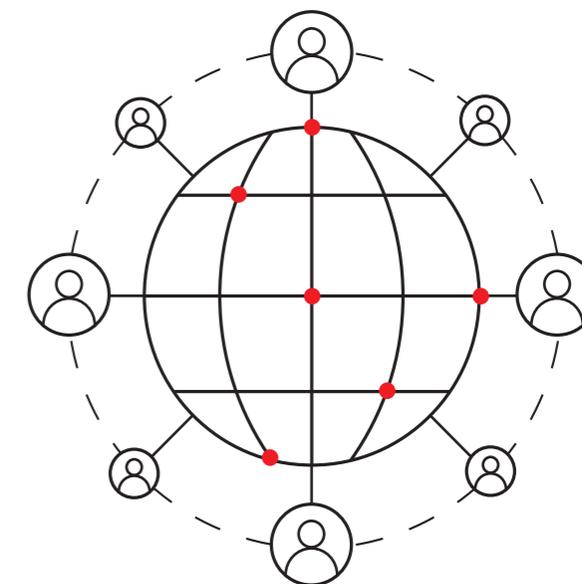
In the year under review, the eco Complaints Office received a total of 431,236 complaints concerning unsolicited advertising emails. This entails an increase of more than 50% compared to the previous year. What should be highlighted here is that the composition and advertised content of the relevant emails were aligned remarkably quickly to the pandemic situation. For example, significantly more advertising emails were sent out for respiratory protection masks. As in previous years, there were also many repeated mailings.

3. Our Network

Working together against illegal web content: National and international partner(ship)s

The Internet knows no state borders. For hotlines to work effectively, it is therefore important for them to be well connected worldwide. As such, the eco Complaints Office works at both the national and international levels

together with a large number of parties, promotes cooperation, and engages in committees and initiatives. The following chapter provides an overview of our network.



3.1 INHOPE (www.inhope.org)

In November 1999, eco – alongside seven other organizations and with support from the European Commission’s “Action Plan on promoting safer use of the Internet” – founded the International Association of Internet Hotlines (INHOPE). For over 20 years, the international network has been successfully working to effectively combat depictions of the abuse of minors.

INHOPE is the international umbrella association of Internet hotlines which operate worldwide and accept complaints about illegal online content, with a particular focus on child sexual abuse material (CSAM). The network now consists of more than 45 hotlines in over 40 countries. Complaints concerning illegal Internet content can thus be forwarded to the relevant responsible partner. In this way, the illegal content is investigated in its respective country of origin, which is also advantageous for criminal prosecution. If reported illegal online content is not located on a server in Germany, the eco Complaints Office informs the responsible INHOPE member in the particular case involved.

This cooperation has proven its worth: Through its members, the INHOPE network covers many countries where depictions of the sexual abuse and sexual exploitation of minors are hosted. The rapid and secure exchange of information across national borders has

also led to the breaking up of numerous child sexual abuse rings.

INHOPE itself is not a hotline, but supports the cooperation of the member hotlines in the individual countries. The umbrella organization sets minimum standards for the processing of complaints and the exchange of reports on the depictions of the sexual abuse and sexual exploitation of minors within the INHOPE network, and offers regular training for the staff of the affiliated hotlines, among other things.

In 2020, the customary in-person meetings, such as annual general meetings and task group meetings, had to take place digitally due to the Corona pandemic. In terms of content, the network placed a focus on the exchange of information on working approaches, staff welfare, and new trends and developments.

Compliance with the defined minimum standards and best practices is reviewed as part of what is known as the Quality Assurance Program. In 2020, the regular rotational review of the eco Complaints Office took place. This again demonstrated that the eco Complaints Office continues to more than meet all minimum standards and best practices.

INHOPE

Since June 2018, Peter-Paul Urlaub, eco Complaints Office Consultant, has been a member of the INHOPE

executive board. He was re-elected in July 2020 and has now taken on the role of Treasurer.

3.2 Safer Internet Centre Deutschland (saferinternet.de)

Since 2004, the eco Complaints Office and the German Association for Voluntary Self-Regulation of Digital Media Service Providers (FSM e.V.) have jointly operated the portal www.internet-beschwerdestelle.de/en, in order to offer users a joint point of contact for reports of illegal Internet content, as well as to provide further information and links to further advisors. Since 2008, the portal has been part of the German Safer Internet Centre (saferinternet.de) – together with the additional partners, [klicksafe](http://klicksafe.de), jugendschutz.net, and “Nummer gegen Kummer”. In 2020, the German Safer Internet Centre was once again co-funded by the European Union as part of the “Connecting Europe Facility”.

As a partner of the Safer Internet Centre Germany, in 2020 the eco Complaints Office held a workshop on, “Online Personae vs. Offline Consequences”/ Risks in the Imitation of Influencers at the international conference, “Keeping Children and Young People Safe Online,” supported by insights into media pedagogical practice from Gala Garcia Frühling (Head of the s.i.n.us Network).

In addition, on the occasion of the European Day for the Protection of Children against Sexual Exploitation and Abuse on 18 November 2020, the eco, FSM, and jugendschutz.net hotlines organized a joint virtual parents’ evening and provided information in particular about cybergrooming, depictions of abuse, sexual violence and exploitation on the Internet.



3.3 fragFINN.de

fragFINN e. V., of which eco is also a founding member, has been offering a protected surfing space for children for over ten years. This is based on a so-called whitelist for Internet sites suitable for children. This whitelist has been developed by fragFINN and is regularly checked by experienced media pedagogues. In the portal “fragFINN.de,” children are provided with, among other things, a search engine which simplifies access for them to Internet sites which are designed to be safe for children.

eco supports fragFINN through participation in its Criteria Working Group, among other things. Participation in the working group enables the members of fragFINN to play an active role in shaping the whitelist specifications, as well as facilitating a regular information exchange on developments and trends. Here, too, fragFINN benefits from its membership structure, as the various fields of expertise and competencies guarantee a three-dimensional protected space in the Internet, one that can respond immediately to new developments.

fragFINN.de

3.4 Network “No Grey Areas on the Internet”

In November 2014, the German Federal Ministry for Family Affairs, Senior Citizens, Women, and Youth (BMFSFJ) launched the network “No Grey Areas on the Internet” against the abuse and sexual exploitation of children. The network works to combat the proliferation of images of children and young people in an unnaturally sexualized pose (frequently also referred to as Posing) or in a sexualized context, and to have this prohibited internationally. In the focus of the network is a competence center which sheds light on the grey zones in sexual exploitation on the Internet.

The comprehensive processing of complaints concerning depictions of Posing of minors on the Internet, as well as their statistical recording and evaluation, is an area in which the eco Complaints Office has been actively supporting the work of the network for over

five years. In 2020, the exchange of experience with the competence center regarding the handling of complaints about depictions of Posing of minors was continued.

At the turn of the year from 2020 to 2021, the “No Grey Areas on the Internet” network was transitioned to the “No Sexualized Violence Against Children on the Internet” working group. As part of the upcoming steering committee comprised of the three German hotlines, the eco Complaints Office actively supported this further development process, which included input in three virtual meetings.

This work is supported by the German Federal Ministry for Family Affairs, Senior Citizens, Women, and Youth (BMFSFJ).

3.5 Cooperation with law enforcement agencies

The eco Complaints Office cooperates with law enforcement agencies at both German federal and state level in order to have illegal content taken down and to report criminal offenses.

In the fight against depictions of the sexual abuse of children, close and effective cooperation with the German Federal Criminal Police Office (BKA) takes place, with this also reflected in the German federal government's report on the success of deleting Child Pornographic web content. The most recent report, published in September 2020, once again showed that the principle of "take-down instead of blocking" and the cooperation of the hotlines, the BKA, and the Federal Review Board for Media Harmful to Minors (BPjM) present very effective means for combatting illegal Internet content. In addition, the collaboration with the BKA has also included a written cooperation agreement between the hotlines (eco, FSM, jugendschutz.net), the BKA, and the BPjM. This agreement has been adapted several times to reflect the most current developments, most recently in 2017.

In the area of state security offenses, the eco Complaints Office cooperates with police authorities and public prosecutor offices at both the federal and state levels. Since 2019, eco has also been a member of the North

Rhine-Westphalian initiative, "Prosecute, don't just delete," and thereby actively supports the rigorous criminal prosecution of hate speech on the Internet. In addition to a regular exchange on hate postings and their legal assessment, the initiative also enables a coordinated and optimized procedure for transferring criminal charges to the Central Bureau and Contact Office for Cybercrime North Rhine-Westphalia (ZAC NRW) of the Cologne Public Prosecutor's Office, which specializes in this area. The partners in the initiative came together in 2020 on the occasion of a working group meeting and the "Protect Freedom – Secure the Law Together" event organized by the State Media Authority NRW (LFM NRW).

In addition, the collaborative work between the eco Complaints Office and the police at state level is part of a cooperation agreement between eco, Networker NRW, and the North Rhine-Westphalia Criminal Police Office (LKA NRW).

The eco Complaints Office is also active at the local level – one example is "SUSII" (Safe-and-Secure-on-the-Internet), a safety and security project that eco established together with the Cologne Police Headquarters in 2016. SUSII (susii.nrw) is a free and non-commercial Internet safety and security portal, targeted initially at citizens (of Cologne), as well as at small and medium-sized enter-

prises (SMEs), and in the meantime extended to cover the districts of Leverkusen and Rhine-Erft. In this context, eco supports the "Make Your Password Strong" cam-

paign launched by the LKA NRW during Cybersecurity Month 2020.

3.6 Cooperation on youth media protection with other relevant actors

In 2020, the eco Complaints Office continued its exchange with other relevant actors in the field of youth media protection and further developed the existing network. For example, at the invitation of the Commission for the Protection of Minors in the Media (KJM), the eco Complaints Office took part in workshop discussions on the technical protection of minors in the media, and also participated in a working meeting with KJM, the German hotlines, and the Federal Review Board for Media Harmful to Minors (BPjM) concerning the receipt and processing of tips from the public about youth-endangering online content.

With a view to the further development of the protection of minors in the media, the eco Complaints Office also participated in the BPjM's digital future workshop.

Due to the close and trustful cooperation between the hotlines, the eco Complaints Office hosted a new employee of the FSM Complaints Office at the beginning of 2020. The exchange focused on the hotlines' processes, questions relating to technical and legal assessments, and joint projects.

For the eco Complaints Office, the Entertainment Software Self-Regulation Body (USK) – due to its many years of experience in the area of youth media protection – is also an important exchange and contact partner in its general scope, but also with regard to questions in individual cases. Since 2019, Sebastian Fitting, Consultant at the eco Complaints Office, has also been active in assessment committees as a youth protection expert for USK.online.

Furthermore, "trusted flagging/reporting" is an essential element of the eco Complaints Office's effective work. The special reporting channels for trustworthy reporter enable direct interaction between hotlines and providers, which also has a positive effect on reaction times. In 2020, cooperation in this area was further expanded. For

example, the eco Complaints Office was appointed to Twitter's Trust and Safety Council for the area of "Child Sexual Exploitation". In addition, the eco Complaints Office was awarded "Trusted Reporter" status by three further online providers.

3.7 Imparting media skills

Media education is a major challenge and responsibility. The adults responsible for this often come up against their own limits. Due to the fast-moving pace of the social networks and messenger services popular with children and young people, knowing how to use and handle these is not always easy.

This is why the Complaints Office makes itself available, among other things, for parents' evenings and teacher training courses, in order to sensitize people to legal risks and thus promote the positive use of all online services. In 2020, for example, the eco Complaints Office hosted a parents' evening at a comprehensive school and pro-

vided practical information on current developments and legal risks in the digital space. In addition, digital event formats were conceptualized and successfully delivered.

Since December 2018, the eco Complaints Office has also been a network partner of the "s.i.n.us" project, "Safely underway with the Internet". This is an association of institutions in the Rhine Neuss district involving schools, parents, police, youth welfare, and addiction support services. The aim of the joint project is to promote the media skills of pupils, teachers, and parents – for example, on the basis of further training opportunities.

4. Online Youth Protection for Companies

Extra benefits for member companies

From the very outset, youth protection has been an important part of the eco Complaints Office's assessment standard. The eco Complaints Office was established on the initiative of our member companies in 1996 and can now look back on 25 years of expertise in this field.

■ Legal expertise

The Complaints Office offers a considerable alleviation to the day-to-day work of member companies of the eco Association, e.g. through initial legal assessments of reports concerning illegal content. This allows unjustified complaints to be filtered out so that providers do not have to deal with them.

■ Close to politics

As part of the Policy, Law & Regulations division, the eco Complaints Office accompanies and monitors political issues and legislative processes at national and international levels and actively brings its expertise and many years of experience to bear on these processes. The eco Complaints Office works in close proximity to world politics, monitors processes, and immediately recognizes and reacts to new developments in the field of youth protection.

■ Network of experts and committee work

The eco Complaints Office represents an important voice on the subject of youth protection: Years of successful cooperation with law enforcement agencies and other hotlines, as well as the active support of national and international committees and initiatives, make the eco Complaints Office the ideal mediator between the industry and state bodies.

■ Lasting offers for Association members

In addition to the full legal qualifications of our staff, who assess online content and any measures to be taken, member companies profit from 25 years of expertise in the field of youth media protection. A particular contribution is made by separate services of the eco Complaints Office, which are offered independently of the general complaint work service.

Youth Media Protection Expert Lunch

With the "Youth Media Protection Expert Lunch," the eco Complaints Office offers an open forum targeted exclusively at association members who are active in the field of youth media protection, with the aims of exchanging experiences and gathering information. Two to three planned meetings are held per year, with additional relevant parties and external experts sometimes also invited to contribute. While these are ordinarily in-person meetings, due to the Corona pandemic, virtual or hybrid formats were offered as an alternative in 2020. Topics under discussion included, in particular, the plans of the federal and state governments to amend the Youth Protection Act and the German Interstate Treaty on the Protection of Minors in the Media (JMStV), the European Commission's strategy to fight child sexual abuse, and obligations for domestic service providers to take action in the case of foreign youth-endangering online content. Additional topics that were addressed included the eco Complaints Office's experiences in combatting illegal content and engaging in other political endeavors. The three meetings planned for 2021 (including one in March) are also expected to take place virtually. In addition, teleconferences and online meetings are offered on specific occasions when information or coordination is required in the short-term.

The following are the focal topics of the Youth Media Protection Expert Lunch:

- The application of the German Interstate Treaty on the Protection of Minors in the Media (JMStV) and the corresponding regulations in the German Criminal Code (StGB);
- Legal developments in youth media protection in its broadest sense;
- "Digital trends"; and
- The activities of the eco Complaints Office.



eco Youth Protection Officer Service

The functions of the Youth Protection Officer:

- Advisory service for the provider
- Contact person for users
- Point of contact for official oversight

Youth protection on the Internet is a task for society as a whole. With the eco Youth Protection Officer Service, both association members and external companies have the opportunity to make their contribution to this cause. Certain telemedia providers with content that is developmentally-impairing or youth-endangering, as well as providers of search engines, may also be obliged to appoint a Youth Protection Officer in accordance with Section 7 of the German Interstate Treaty on the Protection of Minors in the Media (JMStV).



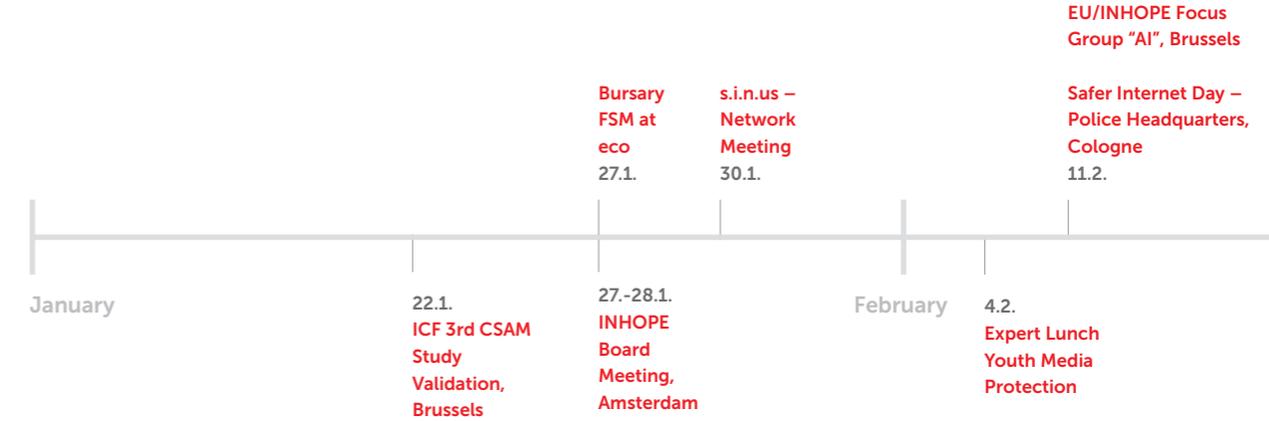
With the eco Youth Protection Officer Service, the Complaints Office provides comprehensive support to telemedia providers in fulfilling this obligation or in the voluntary appointment of a Youth Protection Officer. It offers the following functions and benefits:

- Comprehensive consultation on matters relating to youth protection
- A neutral point of contact between telemedia providers and their users
- The minimization of liability risk
- Prevention of official fines and written warnings
- An increase in user trust through effective youth protection
- Current information and updates on developments and legal changes in the area of youth media protection
- A service tailored to the type of provider
- A seal of quality/logo for websites

If you are interested in availing of or finding out more about this service, we'd be happy to hear from you at the following email address:

jugendschutzbeauftragte@eco.de

5. Events, Representation, and Political Work



In its fight against illegal Internet content, in 2020 the eco Complaints Office continued its active involvement in numerous events and committees at national and international level. The following chapter features a sample of some of these activities, as well as outlining their related successes and challenges.

22.01.2020

ICF 3rd CSAM Study Validation Meeting

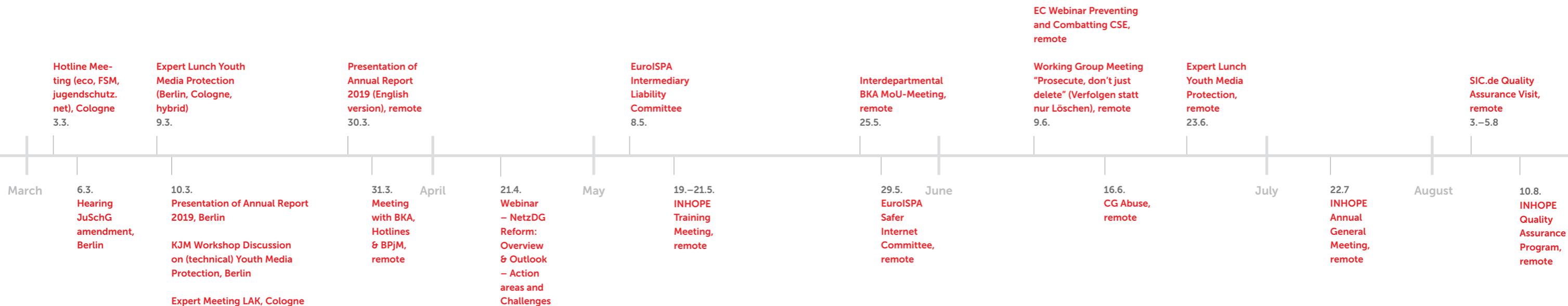
In 2020, the consultancy firm ICF proceeded with its project involving an evaluation study on the work of European and selected pan-European hotlines. Among other activities, a workshop was held in Brussels on 22 January 2020, which addressed (initial) results and recommendations derived by the ICF for the further development of hotlines in the field of “Combatting depictions of sexual abuse of minors”. Besides eco, other organizations involved were the French and Belgian hotlines (Point de Contact, Child Focus), Interpol, Europol, the

EC, INHOPE, and John Carr. eco reiterated the need for a solid basis for the recommendations and future plans

11.02.2020

Safer Internet Day 2020 “Together for a Better Internet”

As it does each year, the eco Complaints Office participated in this international campaign day to minimize risks in dealing with Internet content through the provision of concrete recommendations for action. Among other inputs, Christian Kubiak, Consultant at the eco Complaints Office, provided information at an event



for teachers organized by the Cologne Police under the title of "No borders! Together against the digital culture of injustice". Christian Kubiak informed teachers about the activities of the Complaints Office and, in particular, shed light on the legal framework of, "Posing depictions of minors using mobile messengers," which are also being more commonly used in day-to-day school life. In addition, Google published expert advice on the topic of online safety on the occasion of Safer Internet Day 2020, including recommendations for action from the Head of the Complaints Office, Alexandra Koch-Skiba.

10.03.2020, 30.03.2020

Presentation of the eco Complaints Office's 2019 Annual Report

On 10 March 2020, the eco Complaints Office presented

its fourth independent Annual Report over the course of a political breakfast at eco's Capital Office in Berlin. The 4,654 cases registered were by far the highest number of justified complaints to date. In 2019, depictions of sexual abuse and sexual exploitation of minors again accounted for a large proportion of the justified complaints.

The report for 2019 once again highlighted that, despite a substantial number of complaints, the principle of take-down instead of blocking works and yields success. For example, around 95 percent of cases worldwide involved successful action against prohibited content, thus maintaining the good success rate from previous years.

In Berlin, the eco Complaints Office also had the honor of welcoming an additional speaker: Dorothee Bär, Minister of State in the Federal Chancellery and Fed-

eral Government Commissioner for Digitalization. The speaker at the virtual presentation of the Annual Report at international level on 30 March 2020 was Dr. Maximilian Schubert, President of EuroISPA, the largest umbrella organization of European Internet service providers.

Amendment to the Protection of Minors in the Media/ 06.03.2020

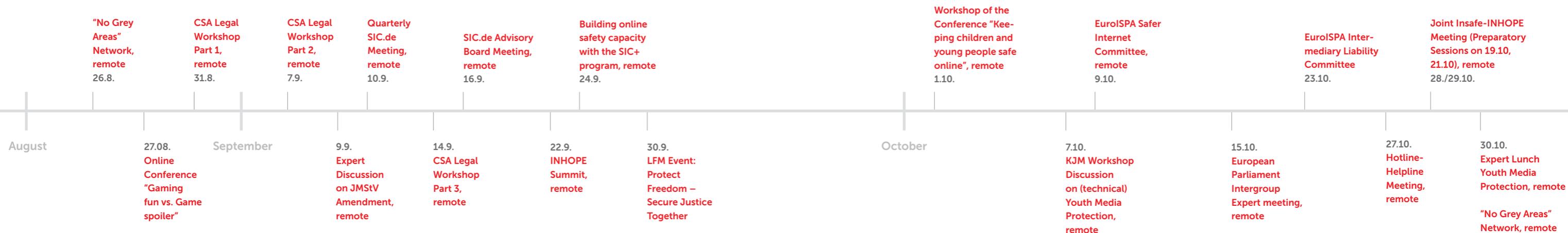
Hearing on the JuSchG

09.09.2020

Expert Discussion on the Amendment to the JMStV

In 2020, the German legislature presented concrete proposals for an amendment to the protection of minors in the media and put them up for discussion. Initially, a draft bill to amend the Protection of Young Persons Act (Jugendschutzgesetz or JuSchG) was presented at the

beginning of the year. The amendment of the JuSchG is intended in particular to take the changed media usage behavior of children and young people into account and to enable minors to participate in relevant media in safe interaction spaces without incurring any risk. The eco Complaints Office's contribution to the amendment process included participation in a hearing at the German Federal Ministry for Family Affairs, Senior Citizens, Women and Youth (BMFSFJ) on 6 March 2020 in Berlin. From eco's point of view, for example, it is important to have a coherent legal framework accompanied by coherent supervisory oversight. What is also imperative is to acknowledge that there is no one-size-fits-all solution, given that different types of providers have different options for action when it comes to combatting illegal Internet content and protecting minors.



In the spring, the German federal states also submitted a discussion draft for the amendment of the German Interstate Treaty on the Protection of Minors in the Media (Jugendmedienschutz-Staatsvertrag or JMStV), which includes fundamental changes regarding the technical protection of minors. The eco Complaints Office contributed to the discussion by participating in an expert meeting on 9 September 2020, as well as in bilateral exchanges of views with representatives of the federal states, and highlighted concerns and existing problems regarding the proposed amendments. Of particular concern here are the proposed obligations for providers of operating systems and browsers and their technical fulfillment.

**10.03.2020
LAK Symposium**

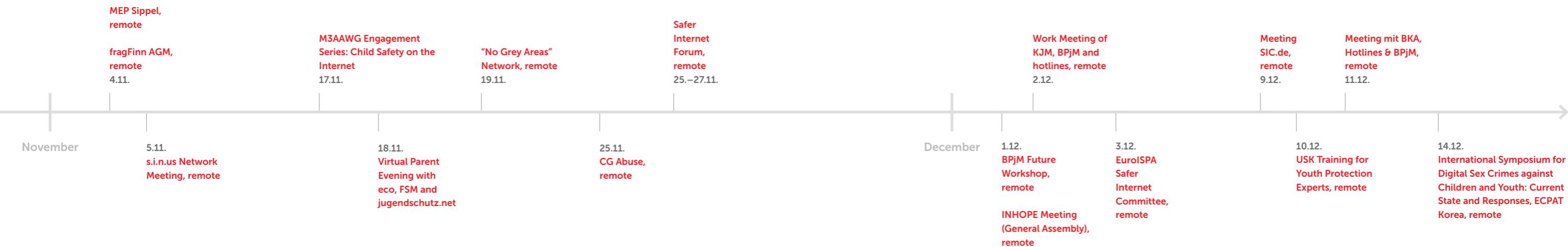
In addition to a wide range of presentations and workshops, in its symposium, "Growing up amid risky structures / Recognize – understand – act together," the North Rhine-Westphalia Youth Welfare, Police and Schools State Working Group (LAK NRW) also offered the opportunity for exchange and networking. Consultant Sebastian Fitting presented the eco Complaints Office and its working approach and, on the topics of sexting, cybergrooming, and Posing, also presented risks as well as recommendations for action for minors.

**10.03.2020, 07.10.2020
KJM Workshop Discussion(s) on (Technical) Protection of Minors in the Media**

At the invitation of the Commission for the Protection of Minors in the Media (KJM), the eco Complaints Office participated in its workshop discussions on 10.03.2020 and 07.10.2020. Representatives of industry associations, self-regulatory bodies, media institutions, and broadcasting experts came together to discuss the current status, challenges, and possible further developments in technical youth media protection. While there was a certain proximity to ideas for an amendment to the German Interstate Treaty on the Protection of Minors in the Media (JMStV), the content of the discussions was less about new regulatory efforts and more about a factual review of the current situation.

**08.05.2020, 29.05.2020, 09.10.2020, 23.10.2020, 03.12.2020
EuroISPA Committees**

Through its participation in virtual meetings of the EuroISPA committees (Safer Internet and Intermediary Liability), the eco Complaints Office was able to actively accompany political and regulatory developments around the fight against prohibited Internet content and youth-endangering content on a European level and to share its own experiences in combatting this content with the other EuroISPA members.



**04.11.2020
Exchange with MEP Sippel**

On 04.11.2020, the eco Complaints Office engaged in a discussion with MEP Sippel on the topic of "Combatting depictions of sexual abuse of minors". The constructive exchange covered not only the current number of complaints and the working approach of the eco Complaints Office, but also the potential impact of the European Electronic Communication Code on Internet service providers' voluntary proactive measures.

**14.12.2020
International Symposium for Digital Sex Crimes against Children and Youth: Current State and Responses, ECPAT Korea**

At the invitation of ECPAT Korea, Peter-Paul Urlaub participated in a virtual international "Symposium for Digital Sex Crimes against Children and Youth: Current State and Responses". In his presentation, "The role of INHOPE and its member hotlines in the fight against child sexual abuse material," he reported on the development of the hotlines and the foundation of INHOPE. He also gave examples of the exchange between international hotlines and the necessary cooperation between law enforcement agencies, hotlines, and Internet service providers. Other topics discussed at the symposium notably included prevention and the current situation in combatting digital sex crimes against minors in South Korea.

6. Public Relations Work

The working approach and positions of the eco Complaints Office could once again be successfully presented to politicians and the press in 2020. An important milestone here was also the presentation of the previous year's Annual Report alongside the German Minister of State for Digitalization Dorothee Bär at the eco Capital Office. The fact that the eco Complaints Office had registered more justified complaints than ever before in 2019 led to a great deal of media coverage: This included reports by several German leading media such as Tagesschau, dpa, Spiegel Online, Deutschlandfunk, Die Welt, and Handelsblatt. Overall, media coverage of the eco Complaints Office increased by around 38 percent compared to the previous year.

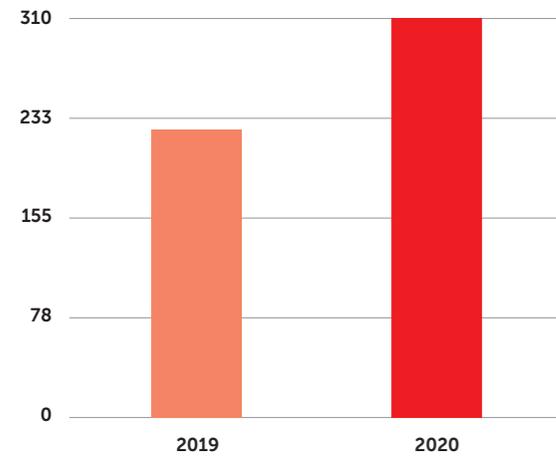
The position of the eco Complaints Office with regard to ongoing legislative processes also gained considerable coverage. For example, with regard to the planned amendment of the Youth Protection Act, Head of the Complaints Office Alexandra Koch-Skiba repeatedly warned against confronting telemedia providers with multiple regulations and duplicate supervisory structures rather than modernizing the functioning youth protection system. Furthermore, the Complaints Office and

the eco Association made it clear to politicians and the press that the principle of take-down instead of blocking and the approach of voluntary self-regulation work, and should not be counteracted by additional mechanisms such as mandatory upload filters.

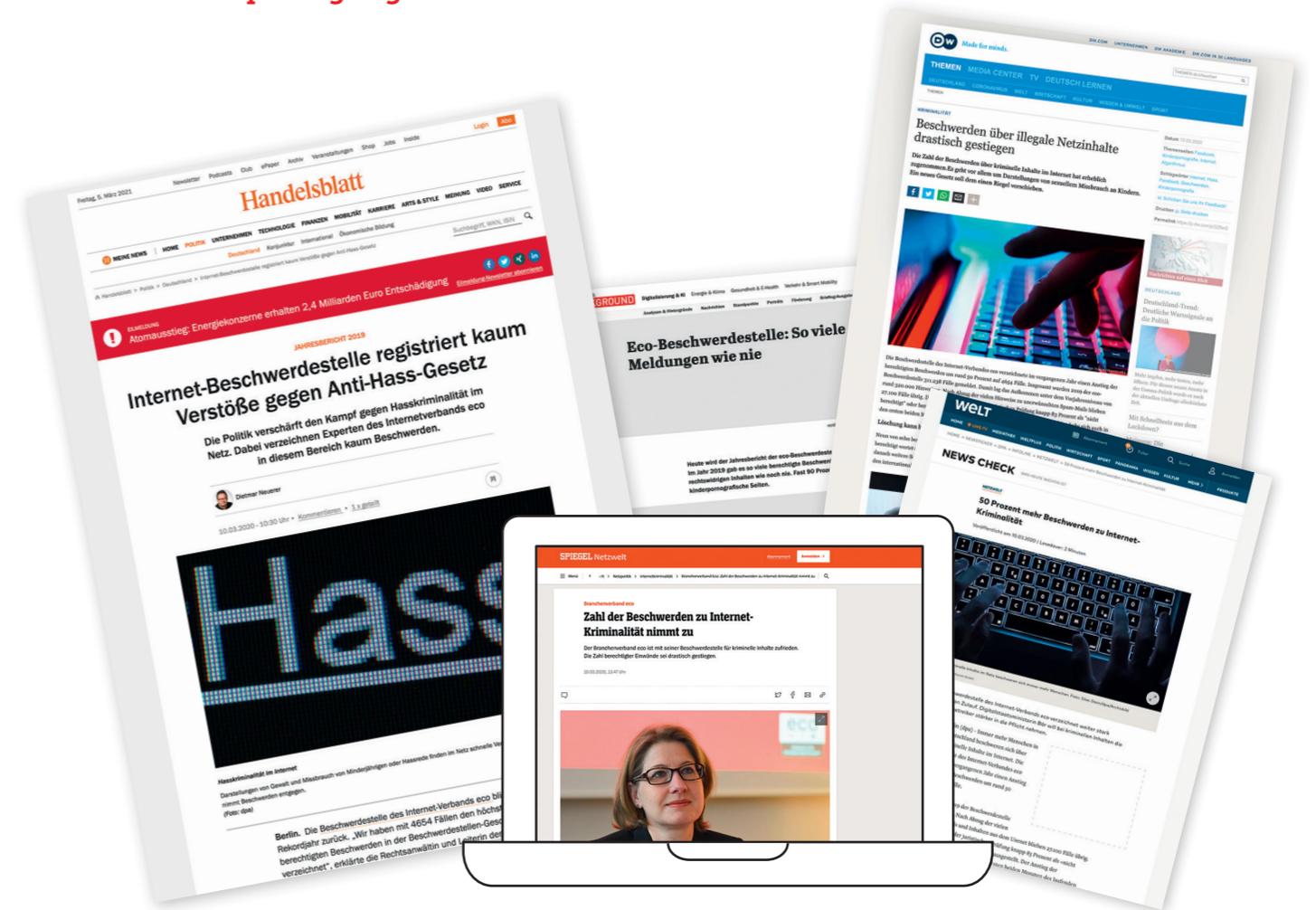
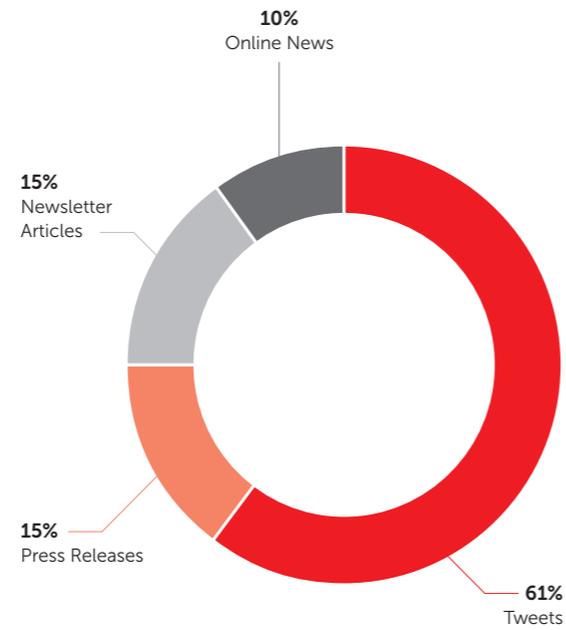
In the course of home schooling and at the beginning of the new school year, the eco Complaints Office also published "surfing guides" for the safe use of the Internet by children and young people. In addition, campaign days and events were supported by publicity, in particular via social media, online news, and newsletter articles. These included numerous campaigns and events that were organized by the eco Complaints Office together with network partners. As well as the international Safer Internet Day on 11 February, the latter also included a virtual parents' evening hosted by the German hotlines: eco, FSM, and jugendschutz.net. In addition, the eco Complaints Office participated in jugendschutz.net's Twitter chat to raise awareness about sexualized violence on the Internet. The prevention platform susii.nrw, jointly initiated by the eco Complaints Office and the Cologne Police, also constituted part of the public relations work.

Topic highlights

eco Complaints Office Media Resonance



PR Activities eco Complaints Office 2020



Social media: Selection of eco Complaints Office tweets

The collage features several tweets from the eco Complaints Office (@eco_de):

- Feb 11, 2020:** A tweet about Safer Internet Day, mentioning that the office supports it and that illegal content should be reported. It includes a diagram showing the reporting process: a person reports content to the office, which then reports it to the relevant authority.
- Mar 10, 2020:** A tweet celebrating the 25th anniversary of the office, mentioning Digital State Minister Dorothee Bär. It includes a photo of Alexander Rabe and Dorothee Bär in front of a '25 Jahre eco' banner.
- Mar 10, 2020:** A tweet announcing the annual report, mentioning the presence of Digital State Minister Dorothee Bär and the office's commitment to transparency.
- Mar 10, 2020:** A tweet about the fight against illegal content, stating that 60% of reports in 2019 were anonymous.
- Mar 10, 2020:** A tweet about the annual report, featuring a video of Alexandra Koch-Skiba presenting the report. The video shows a slide that reads: 'Engagiert gegen rechtswidrige Inhalte im Internet. eco Beschwerdestelle: Jahresbericht 2019'.
- Mar 21, 2020:** A tweet about International Day Against Racism, stating that the office has been fighting illegal content for over 20 years. It includes a graphic with the text 'eco BESCHWERDESTELLE' and '25 Jahre eco 25 Jahre Netz mit Verantwortung'.
- Mar 21, 2020:** A tweet about International Day Against Racism, mentioning that the office does not ignore racist symbols and that such content should be reported. It includes a photo of a large sculpture of a person with a broken back.
- Jul 9, 2020:** A tweet about a new video series 'Netz mit Verantwortung', asking what it means for users. It includes a video of Alexandra Koch-Skiba speaking.
- Oct 6, 2020:** A tweet about a campaign 'A3: Nicht wegschauen, sondern handeln!', encouraging users to report illegal content. It includes a quote from Alexandra Koch-Skiba: 'Ein Hinweis bei Beschwerdestellen genügt, damit illegale Inhalte gelöscht und strafrechtlich verfolgt werden.' and a photo of her.
- Oct 6, 2020:** A tweet from jugendschutz.net asking what users can do to stop sexualized violence against children.
- Oct 21, 2020:** A tweet about 'Tag der Kinderseiten' (Children's Day), encouraging parents to register for a webinar. It includes a flyer for the webinar 'Einladung zum virtuellen Elternabend' with the text: 'Cybergrooming, Missbrauchsdarstellungen, sexuelle Gewalt/Ausbeutung und Co. - was Eltern und Erziehende wissen müssen, um ihre Kinder online zu schützen!'.
- Oct 21, 2020:** A tweet about a joint event with jugendschutz.net and FSM, including a flyer for 'JUGENDSCHÜTZNET'.

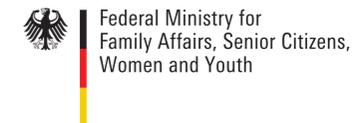
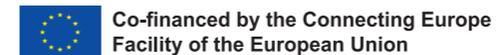
What can you do?

Every report counts in the fight against illegal content! If you come across content online that you believe is illegal, don't hesitate: Report it to the eco Complaints Office – simply and anonymously at

complaints-office.eco.de



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Legal Notice

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