

eco   
COMPLAINTS OFFICE

Annual Report 2023

Table of Contents

| | | | |
|---|----|--|----|
| Foreword by Tabea Rössner, Member of the German Bundestag, Chair of the Committee on Digital Affairs | 04 | 2.4 Complaints about anti-constitutional content in detail | 32 |
| Foreword by Alexandra Koch-Skiba, Head of eco Complaints Office | 06 | 2.5 Complaints about unsolicited advertising emails | 36 |
| 1. eco Complaints Office: | | 3. Our Network | 38 |
| Who we are and what we do | 08 | Working together against illegal web content: National and international partner(ship)s | 39 |
| Dedicated to combatting illegal content on the Internet | 09 | 3.1 INHOPE | 40 |
| 1.1 Simply and anonymously: Submitting a complaint | 10 | 3.2 Safer Internet Centre Germany (saferinternet.de) | 41 |
| 1.2 What kind of illegal content does the eco Complaints Office process? | 11 | 3.3 fragFinn.de | 42 |
| 1.3 "Take-down instead of blocking": Self-regulation rather than Internet censorship | 12 | 3.4 Cooperation with law enforcement agencies | 42 |
| 1.4 Measures taken by the eco Complaints Office | 13 | 3.5 Collaboration on youth media protection with other relevant actors | 44 |
| 2. Complaints 2023: Facts and Figures | 14 | 3.6 Imparting media skills | 46 |
| 2.1 Number of complaints and measures taken in 2023 in the field of youth media protection | 15 | 3.7 Special cooperation via the eco Complaints Office's partnership model | 47 |
| 2.2 Success rate for web-based content | 24 | 4. Online Youth Protection for Companies | 48 |
| 2.3 Complaints about sexual violence and boundary violations against children and young people | 25 | Extra benefits for member companies | 49 |
| 2.3.1 Notable challenges in 2023 | 27 | Youth Media Protection Expert Lunch | 50 |
| 2.3.2 Overview of reaction times for web-based Child Pornography cases | 29 | eco Youth Protection Officer Service | 51 |
| 2.3.3 Overview of reaction times for web-based Posing cases | 31 | 5. Events, Representation and Political Work | 52 |
| | | 6. Public Relations Work | 60 |

Foreword by Tabea Rössner, Member of the German Bundestag, Chair of the Committee on Digital Affairs

Dear Readers,

For some years now, the Internet has served as the primary medium for young people to access information and engage in communication. Accordingly, they spend a considerable amount of time online. In 2023, young people spent 63.7 hours a week on the Internet – for entertainment, information and social interaction. However, as clearly demonstrated by the figures in the eco Complaints Office's 2023 Annual Report, this also creates a growing risk for exposure to illegal content that is harmful to young people. In particular, these include depictions of brutal and sexualized violence against children, as well as anti-constitutional content. As revealed by the triple increase in complaints received in 2023, the degree of illegal content is clearly continuing to rise. Nonetheless, there also appears to be a growing awareness among the population, leading to more complaints being made. Furthermore, the success rate of 98.35 percent in addressing web-based content through content removal or legalization (e.g. through age verification) also proves that – despite

obstacles such as obfuscation techniques or IP blocking – it is possible to effectively combat illegal content. In taking technological developments into account, this path must be pursued and expanded, given that AI applications such as deepfakes can in particular exacerbate the problem of illegal content and its dissemination.

As Chair of the Committee on Digital Affairs, I have been advocating for many years for a secure Internet that upholds the fundamental rights of our democratic society and the fundamental values regarding respect for human dignity, security, freedom of the press and freedom of expression, thus fostering trust in digital services. An Internet of regulation and self-regulation has proven its worth in this context. With the new European regulations and their supervisory structures, we must continue along this path in a practical manner. The Digital Services Act which has just come into force establishes uniform regulations across Europe, placing specific demands on providers and enhancing supervision. In order to effectively combat illegal content,

regulations have been introduced on reporting and redress systems, as well as for whistleblowers, transparency obligations and recommendation systems. In this context, the work of national complaints offices remains crucial, as they can prioritize reporting as "trusted flaggers." I am confident that the eco Complaints Office will continue its important work in the future in collaboration with the relevant stakeholders in the field of youth media protection, with these including the state media authorities, the German Federal Agency for the Protection of Minors in the Media (BzKJ), the Entertainment Software Self-Regulation Body (USK) and the German Federal Criminal Police Office (BKA). This will thereby significantly contribute to a safe Internet environment.

**Yours sincerely,
Tabea Rössner**



Optimized processes and enhanced cooperation for effectively combatting illegal Internet content

Dear Readers,

In 2023, we registered a sharp increase in the number of complaints. With 17,493 actionable complaints, we reached a new record level, with the number of actionable complaints almost doubling compared to the previous year. Due to this significant increase, the past year was characterized by ongoing process optimizations to continue to take effective action against prohibited Internet content.

This annual report vividly illustrates the effectiveness of our actions: Despite the significant increase in complaints, we were able to obtain take-down of 98.35 percent of the web content complained about worldwide! Websites hosted in Germany containing content classified as Child Pornography were removed 100 percent of the time, on average just under two days. Globally, such content was removed within an average of approximately six days, with an overall success rate of 98.87 percent. This once again underlines the relevance of the work of the complaints offices (on an international level also

known as hotlines) and the effectiveness of the principle of "take-down instead of blocking." A big thank you to all complainants – their reports actively contribute to take-down and criminal proceedings!

Good collaboration with network partners is essential for our work. For this reason, in the past year we intensified the exchange and collaboration with our network partners, particularly the partner hotlines from the INHOPE network. Particularly noteworthy were the bursary visits supported by INHOPE as part of the peer-to-peer exchange program, which allowed for several days of exchange with colleagues from France, Ireland, Hungary, Poland, Finland and Portugal. We also laid the groundwork for future technological collaboration with FSM and nic.at.

From a political perspective, our year was once again shaped by the debate surrounding the CSAM Regulation proposed by the EU Commission, while the amendment of the Interstate Treaty on the Protection of Minors in the Media was also of particular relevance. Given that the CSAM Regulation proposed by the EU Commissioner for

Home Affairs, Ylva Johansson, was curtailed by the Parliament, and that the Member States have not yet been able to reach an agreement, the issue will continue to occupy us in the next EU legislative term. We continue to hope for an open consideration and strengthening of the important work of the hotlines within the framework of further legislative debates on the CSAM Regulation.

As a society, we must collectively strive to ensure that there is no room for hatred and distrust on the Internet and campaign for modern youth media protection at all levels. Raising society's awareness of the inadmissibility of content harmful to children and adolescents and other illegal content is of paramount importance. Our dedication will therefore continue to extend over and above complaints processing.

I look forward to further collaboration, exchange and joint activities!

Alexandra Koch-Skiba

Attorney-at-Law, Head of eco Complaints Office



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.

The Complaints Office team is composed of eight employees with a legal background, with these including the Head of the Complaints Office, four 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 <https://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, in 2023 the eco Complaints Office was once again a partner of the information platform for young people, jugend.support, and continues to process reports submitted there together with the FSM and jugendschutz.net hotlines.

In addition, in 2023 the eco Complaints Office continued to support the advice and help platform for young people, jugend.support, and processed incoming reports of illegal content in cooperation with the FSM and jugendschutz.net hotlines. Following the merger of jugend.support with [juuuport](https://juuuport.de), this reporting option is now available at juuuport.de.

In order to effectively fight illegal online content, collaboration 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 (IN-HOPE), an international network that supports hotlines worldwide. In addition, eco is part of the German Safer Internet Centre.

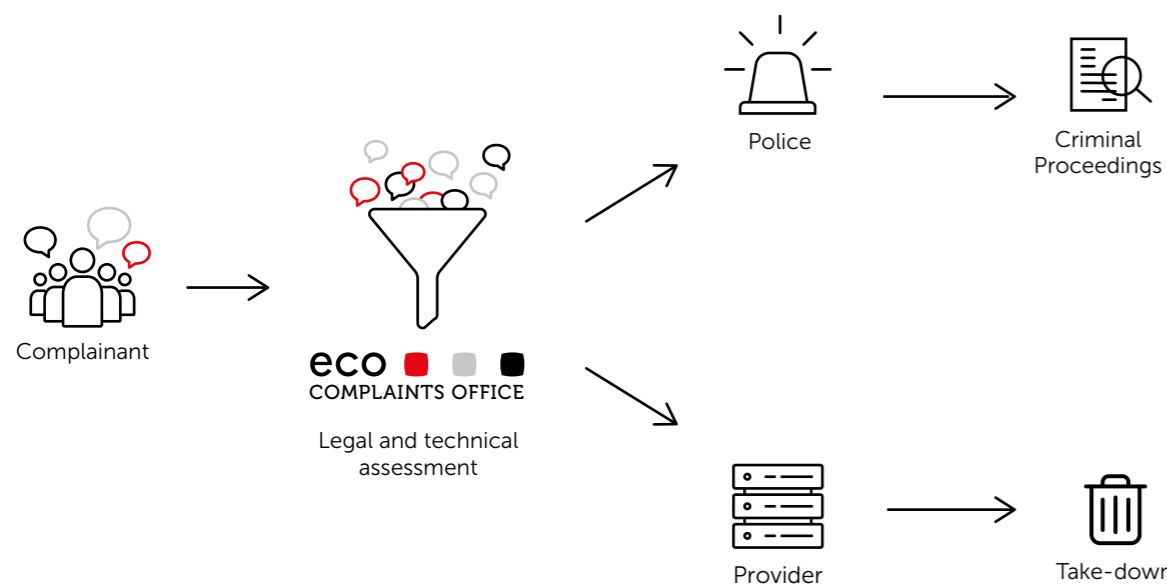
In all of this, the eco Complaints Office serves as a model for neutral and transparent processes and acts as the contact partner for association members, the state, society and politics.

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 all Internet users. The provision of personal data is optional, which also allows a report to be made anonymously.

Report illegal Internet content to the eco Complaints Office



This infographic gives a simplified representation of the processing of German cases

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 process, the eco Complaints Office handles complaints related to the following illegal Internet content:

- Sections 4, 5 German Interstate Treaty on the Protection of Minors in the Media (JMStV), youth-endangering and developmentally impairing content, and 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 176b StGB, grooming
- Section 201a StGB, dissemination of naked images of minors for profit
- Section 111 StGB, public incitement to crime

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

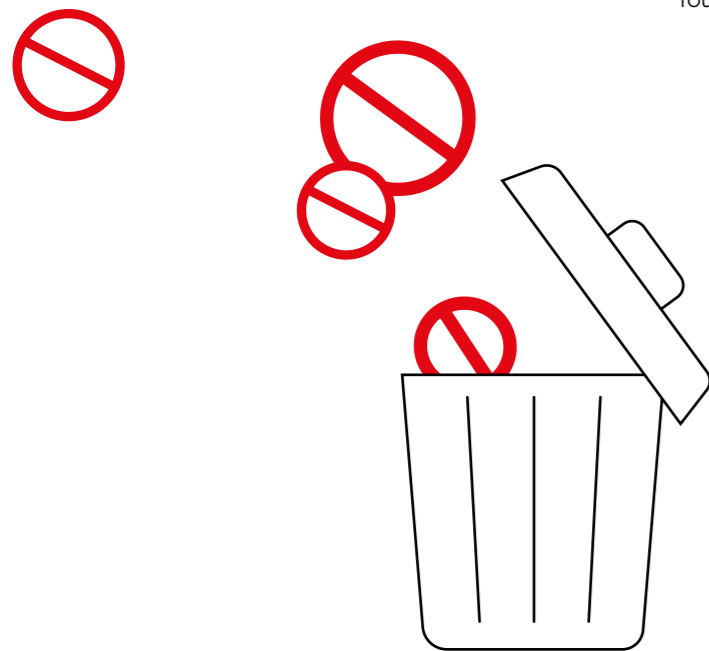
Information and definitions of the various offenses can be accessed online at:

go.eco.de/Legalbasis_ComplaintsOffice_2022

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

In the fight against prohibited web content, the take-down of content from the Internet is the core and most worthwhile 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 outset.

The Internet industry’s self-regulation mechanisms for the fight against unlawful online content work very well at both the national and international levels. In this regard, in the year under review, approximately 98 percent of the content reported by the eco Complaints Office was removed – worldwide. A detailed presentation of the success rates and reaction times can be found in Chapter 2.2 to 2.4.



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 Internet content hosted in Germany is always reported to the authorities. In addition, the eco 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 developmentally impairing content**, the provider will be requested 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 of the respective state. 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, even if the respective offense has no direct connection to Germany. However, in such cases, the offense must be something directed against internationally protected legal interests; for example, in instances involving Child Pornography content or violations of international law.

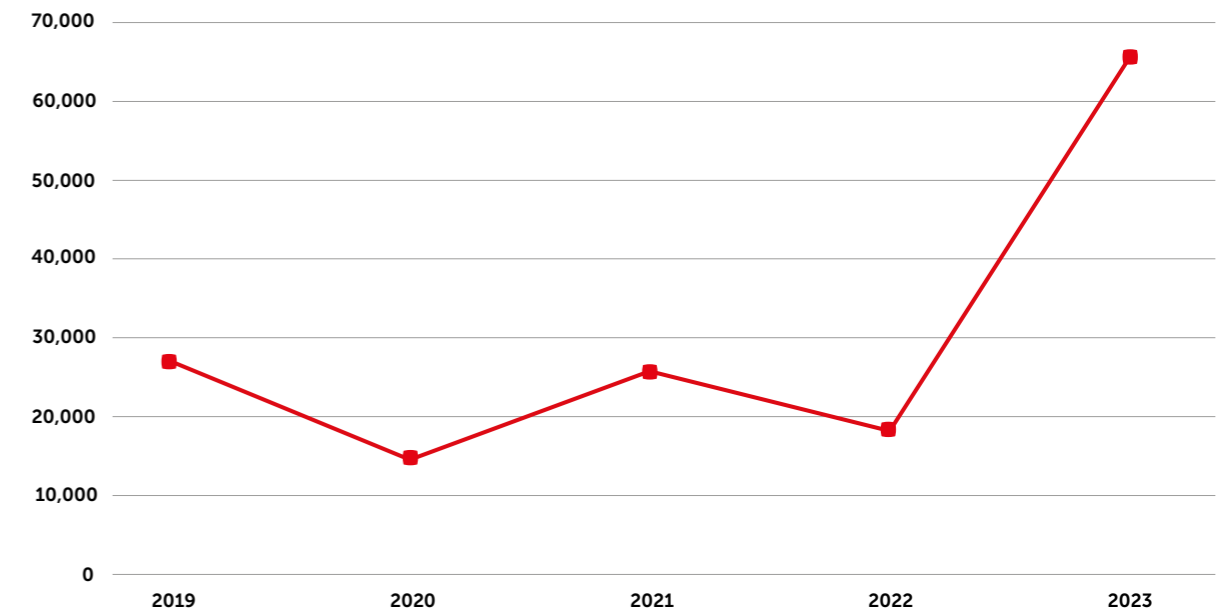
On each working day, the eco Complaints Office monitors any continued availability of the reported content. If necessary, the provider will be asked again to remove or legalize the reported content. Complainants who have provided a return address will be briefly informed of the outcome of the legal assessment.

2. Complaints 2023: Facts and Figures

2.1 Number of complaints and measures taken in 2023 in the field of youth media protection

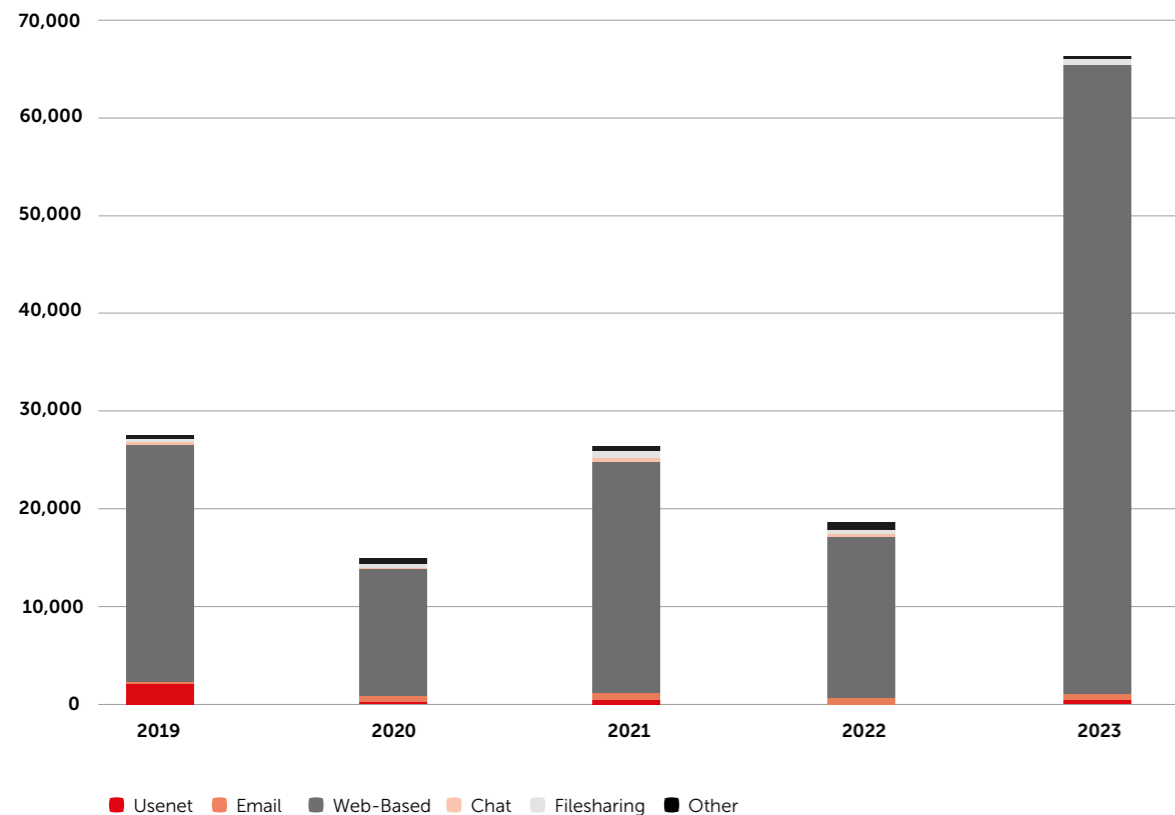
In the year under review, the eco Complaints Office received a total of 65,998 complaints based on potentially criminal content or content relevant to youth media protection.

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



Source: eco Complaints Office, 2024

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

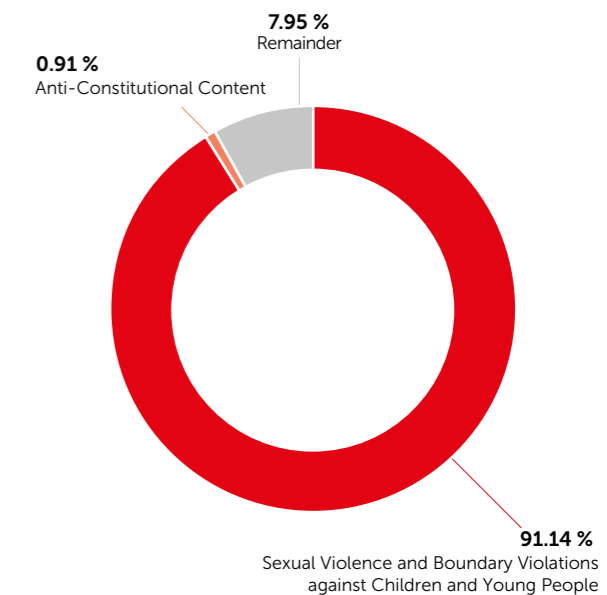


Source: eco Complaints Office, 2024

As in previous years, the majority – around 91 % – of the complaints received (60,151 cases) related to “sexual violence and boundary violations against children and young people.” In particular, these involved depictions that were legally categorized as Child Pornography* as defined in Section 184b of the German Criminal Code (StGB). With regard to reports of anti-constitutional content, there was a slight increase in the number of reports (603 cases). In addition, reports on freely accessible adult pornography (279 cases) and so-called developmentally impairing content (1,049 cases) also rose in comparison to the previous year.

*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.

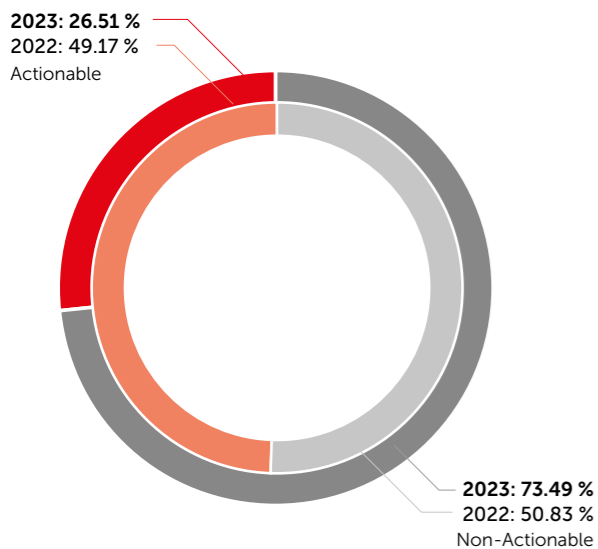
Received Complaints in the Field of Youth Media Protection (2023)



Source: eco Complaints Office, 2024

Around a quarter of the complaints received in the reporting year were actionable for the eco Complaints Office ("actionable complaints"). A complaint is considered as actionable if a violation of the law is detected, and measures are taken subsequent to an assessment. As a matter of principle, 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 (e.g., reports to the police and

Proportion of Actionable Complaints in the Field of Youth Media Protection (2023 in Comparison to 2022)

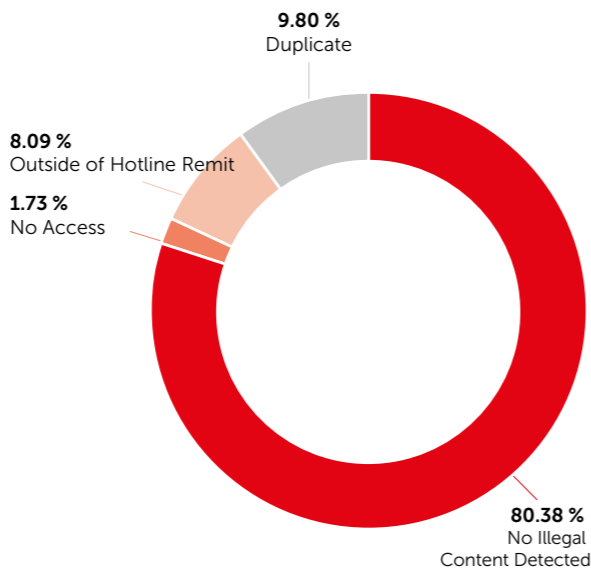


Source: eco Complaints Office, 2024

to the eco Complaints Office in a joint email, knowledge of measures taken by partner hotlines, duplicate reports, etc.).

Compared to the previous year (2022: 8,904 actionable cases), the number of actionable complaints almost doubled: With 17,493 cases, in 2023 the eco Complaints Office consequently recorded a new peak in actionable complaints.

Non-Actionable Complaints 2023

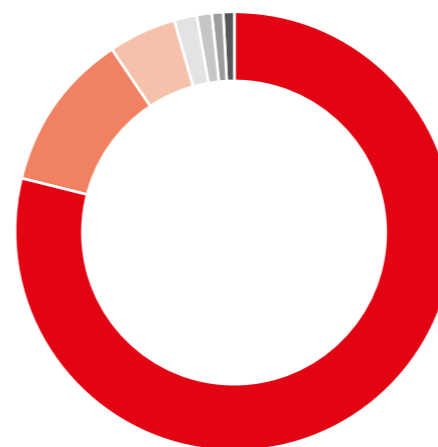


Source: eco Complaints Office, 2024

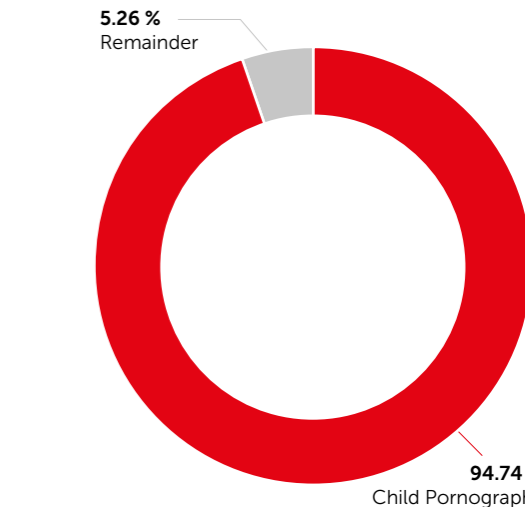
As in previous years, a large proportion of the actionable complaints involved content that is accessible via websites of all kinds (web-based content).

In terms of content, Child Pornography content – as in previous years – also accounted for the largest share of actionable complaints. In this context, an increase of 3.12 percentage points was recorded in the year under review.

Actionable Complaints 2023 in the Field of Youth Media Protection (Excluding Child Pornography)



Actionable Complaints 2023 in the Field of Youth Media Protection

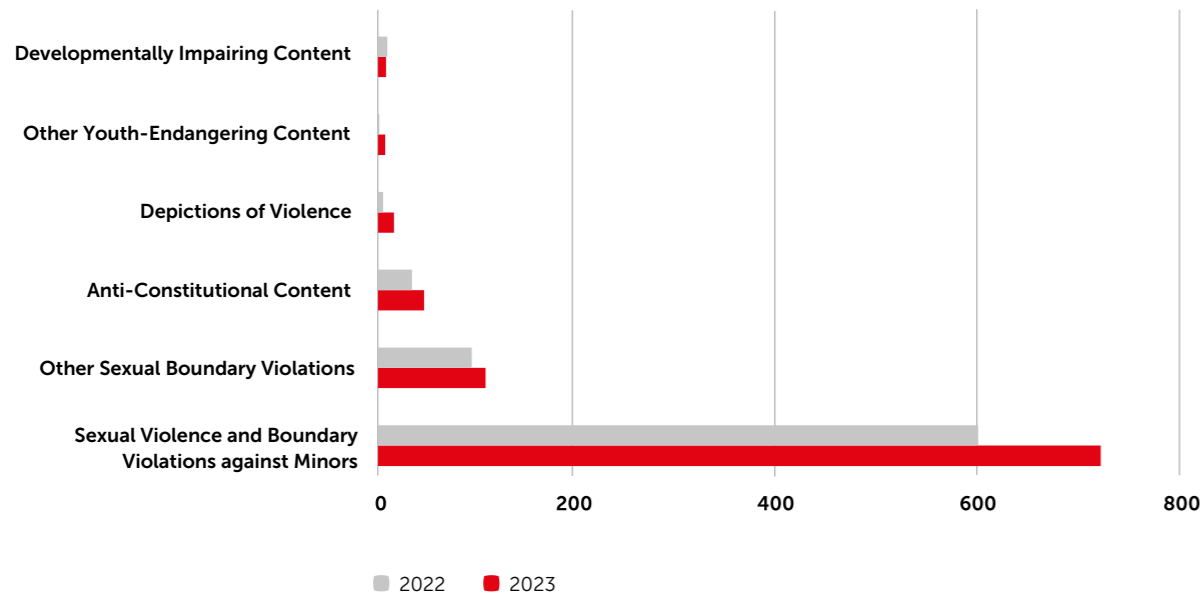


Source: eco Complaints Office, 2024

- 78.91 % Sexual Violence and Boundary Violations against Minors
- 11.74 % Other Sexual Boundary Violations
- 5.00 % Anti-Constitutional Content
- 1.74 % Depictions of Violence
- 0.98 % Other Youth-Endangering Content
- 0.87 % Developmentally Impairing Content
- 0.76 % Other

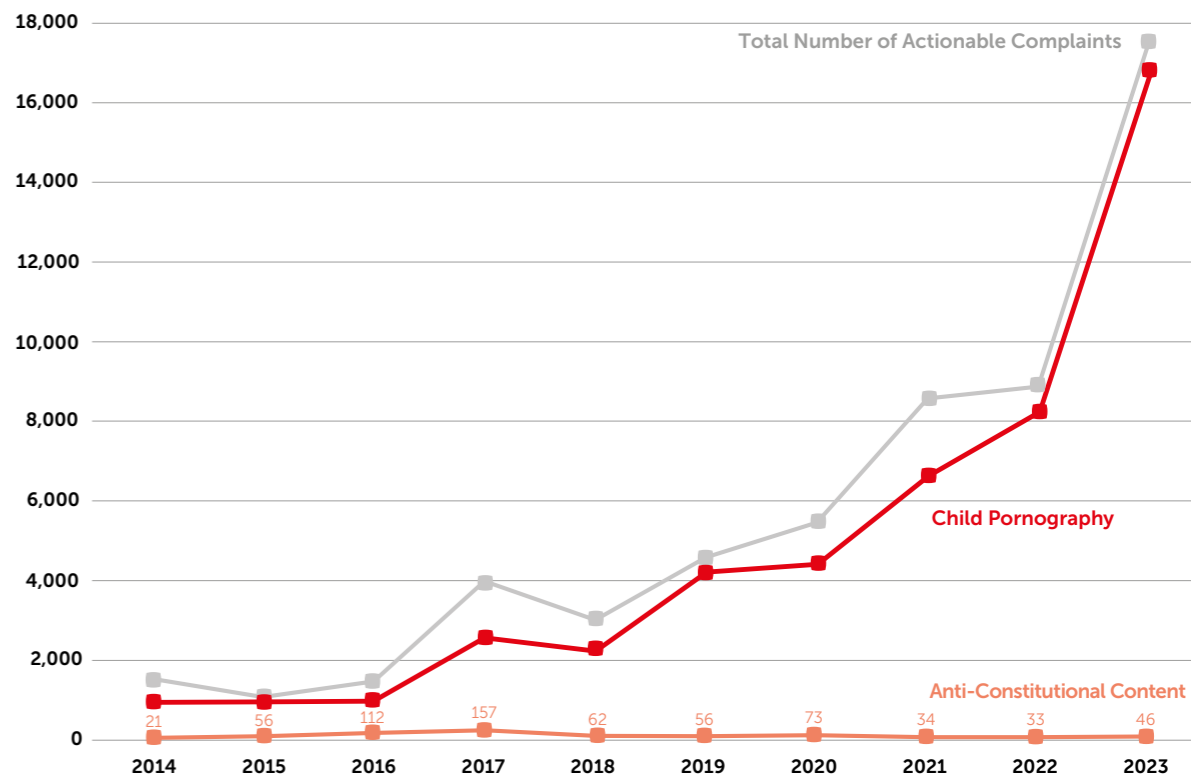
Source: eco Complaints Office, 2024

Youth Media Protection Actionable Complaints (Excluding Child Pornography)



Source: eco Complaints Office, 2024

Growth in Number of Actionable Complaints in the Field of Youth Media Protection



Source: eco Complaints Office, 2024

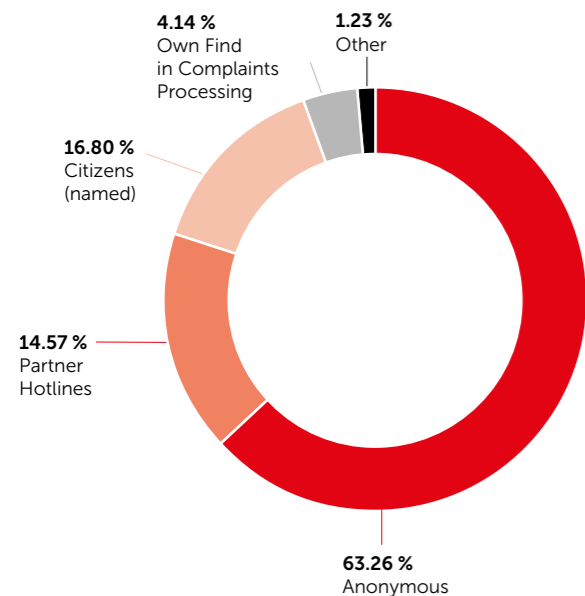
Once again, it has been proven that it is important to have the option to report illegal content anonymously, with almost two thirds of the reports received anonymously by the eco Complaints Office.

This proportion is roughly the same as in the previous year. In relation to the other reporting sources, there are also no major deviations compared to the previous year.

Last year, the eco Complaints Office sent a total of 26,288 notifications (in particular to the police, INHOPE partner hotlines, and/or ISPs – with this number not including reminders). In this context, the relatively low proportion of reports sent to the police is attributed to the fact that, in cases of depictions of abuse of children on content hos-

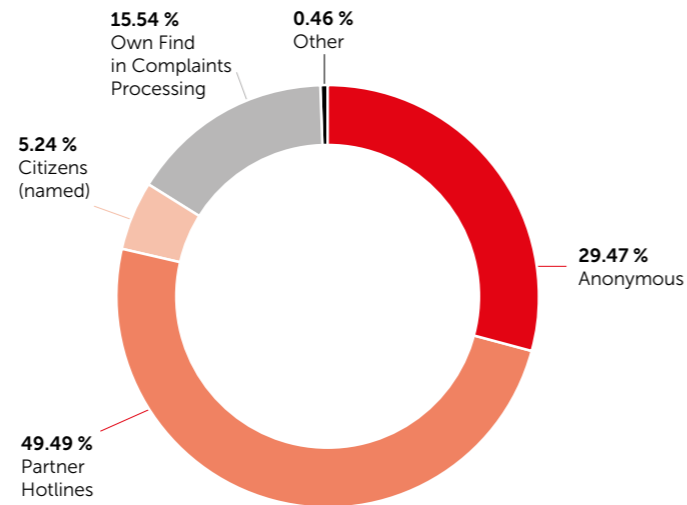
ted abroad, a report is generally only made to the German Federal Criminal Police Office (BKA) if no INHOPE partner hotline exists. If, on the other hand, an INHOPE member can be contacted who in turn informs the law enforcement agencies, reporting to the BKA is generally refrained from in order to avoid duplication of work.

Reporting Sources of the Received Complaints (2023)



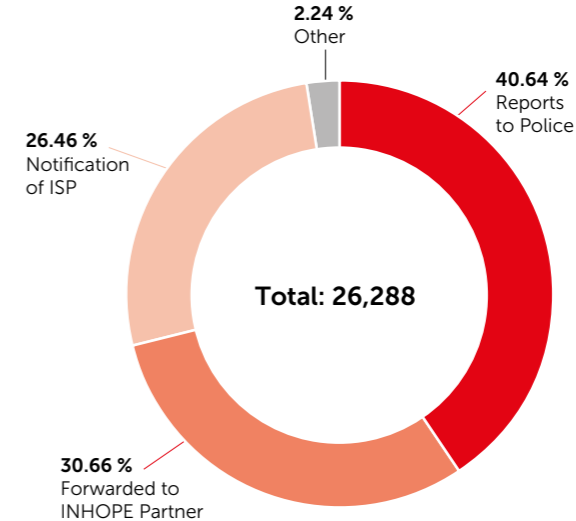
Source: eco Complaints Office, 2024

Reporting Sources of the Actionable Complaints (2023)



Source: eco Complaints Office, 2024

Measures Taken 2023



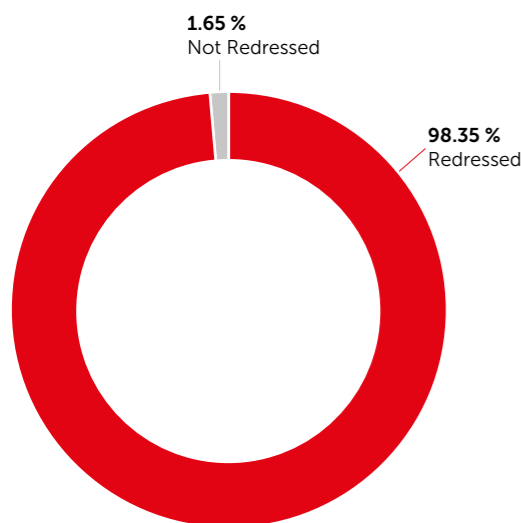
Source: eco Complaints Office, 2024

2.2 Success rate for web-based content

Once again, the success rate for web-based content, which has been high for years, increased slightly compared to the previous year: 98.35 percent of the content reported upon by the Complaints Office was taken down or otherwise legalized (for example, through the implementation of an age verification system); in around 16.2 percent of these cases, the reported URL was initially moved to another provider (so-called "moved cases").

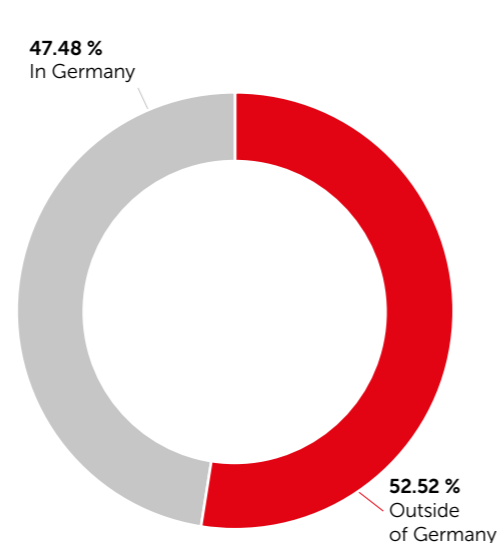
This demonstrates that self-regulation works, also internationally. Because just less than a half of the reported URLs (47.8 percent) were hosted in Germany.

Total Success Rate for Web-Based Content 2023



Source: eco Complaints Office, 2024

Hosting of Web-Based Content 2023



Source: eco Complaints Office, 2024

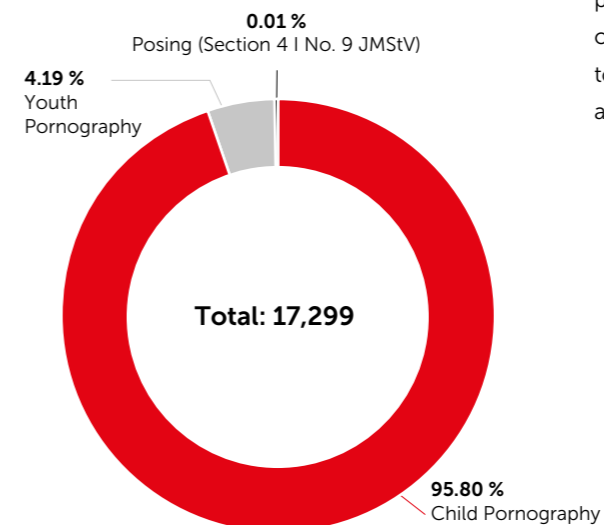
2.3 Complaints about sexual violence and boundary violations against children and young people

The number of actionable complaints regarding sexual violence and boundary violations against minors nearly doubled in the year 2023. Of the total of 17,299 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.

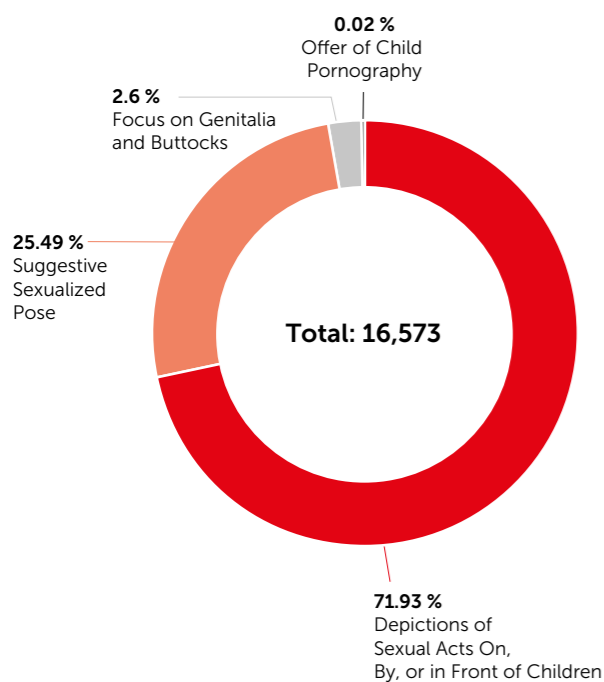
The offense of Child Pornography comprises depictions of sexual acts on, by, or in front of children, depictions of partially or completely naked children in a suggestive sexualized pose, and the sexually provocative reproduction of the naked buttocks or genitalia of children. Almost three-quarters of actionable Child Pornography complaints in 2023 concerned the first variant (depictions of sexual acts on, by, or in front of children). Compared to the previous year, this represents a slight decrease of around 3.6 percentage points.

Actionable Complaints on Sexual Violence and Boundary Violations against Children and Young People (2023)



Source: eco Complaints Office, 2024

Content Qualified as Child Pornography (2023)



Source: eco Complaints Office, 2024

In 2023, around 25.6 percent of the actionable complaints in the area of depictions of “sexual violence and boundary violations against children and young people” concerned Posings, which constituted an increase of approximately 5.6 percentage points compared to the previous year.

Posing is understood as images of minors in an unnatural or suggestive sexualized pose. Under German law, such content may 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).

2.3.1 Challenges in 2023

From a technical viewpoint it is important to emphasize that in 2023 – as in previous years – obfuscation tactics were used in the dissemination of illegal material. The aim of these tactics is to enable only a certain group of people to access the prohibited content, while at the same time making it more difficult for others (such as hotlines, law enforcement officers, etc.) to directly access this prohibited content:

What is not uncommon is that depictions of sexual violence and border violations against minors are only accessible with a so-called referrer. Here, users must come from a specific “source” site, which refers across through a link. The “destination” site registers where users have come from and shows different content, depending on the request. A more complex, but comparable, method triggers this technical path-setting through the use of cookies. In this scenario, users can only access the content in question if the specifically defined cookie file recognized by a browser is present on their computer, which may, in turn, have been created by a previously visited page. In both cases, different content is displayed depending on the digital path followed or simulated. Technically, these processes can be simulated using particular tools.

In some cases, access to content for certain user IPs or locations (e.g., entire countries) is blocked from the operator side and/or appears to be unavailable for access from these IPs or locations. In such instances, reported content can only be accessed by using a proxy server or VPN service.

The involvement of Content Delivery Networks (CDNs) also makes it more difficult to process cases. In such cases, an inquiry must be made at the CDN to identify the host provider, which means an additional step in the processing of the report (both during initial processing and as part of the availability check before a reminder is sent). Fortunately, there is usually a speedy response through the CDN. Occasionally, explanations to the recipient also require a notification that a CDN is involved.

From a legal perspective, in some cases the boundary between the different varieties of offense in relation to Child Pornography as defined in Section 184b of the German Criminal Code posed a challenge, especially with regard to statistical recording. This also applies to the boundary between Child Pornography and other relevant regulations in the area of depictions of sexual violence and border violations against minors.

In addition to the often difficult age assessments, particular examples relate to the distinction between images of children in an unnatural or suggestive 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.

In the processing of complaints on content distributed via file hosting services (mostly videos), the viewing of this content in 2023 was also more time-consuming. In addition, some content could only be accessed with a premium account. The platform operators concerned did not always provide us 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 2023, in a few isolated cases, the eco Complaints Office also found that distributors of illegal content transferred their content to another hosting provider, especially after take-down by the original provider. In some cases, they also transferred the content to hosting countries where there is not yet an INHOPE partner

hotline. To some extent, this made it more difficult to make contact and submit requests for take-down.

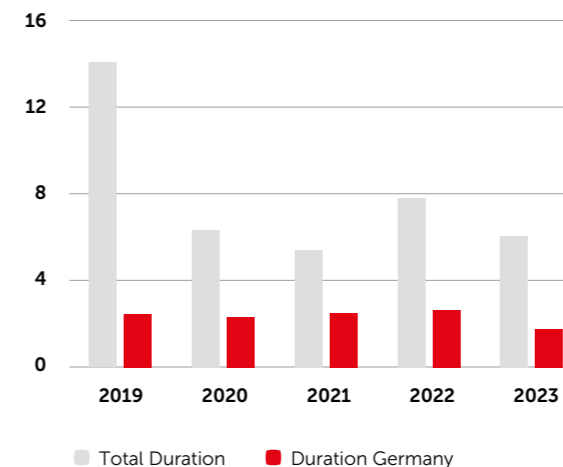
In general, there were only a few host providers from outside of Germany who consistently ignored notifications from us (and other hotlines) and requests for take-down, or who were extremely slow to implement them, regardless of the content.

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

The following figures and graphs on reaction times for Child Pornography web content and Posing cases do not always represent the effective or actual reaction time of the Internet Service Provider (ISP). Instead, these represent the time from which the eco Complaints Office receives the report until the eco Complaints Office verifies the take-down. Here, the frequency of checks

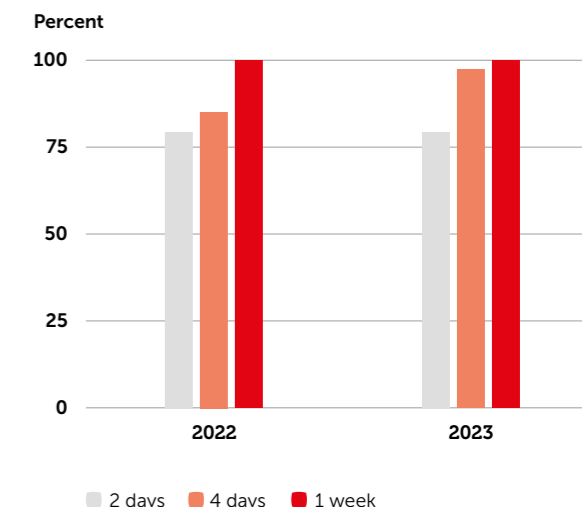
to ascertain take-down also influences the reaction times: the more often checks are made to see whether the content has been taken offline, the more exact and conclusive statements regarding reaction times are. In general, the eco Complaints Office checks for take-down on weekdays and does not remove the weekends and public holidays during which the eco Complaints Office does not work from the calculation of the accessibility and success rates.

Average Duration until Take-Down in 5-Year Annual Comparison (Child Pornography)



Source: eco Complaints Office, 2024

Take-Down Rates Child Pornography (German Cases)

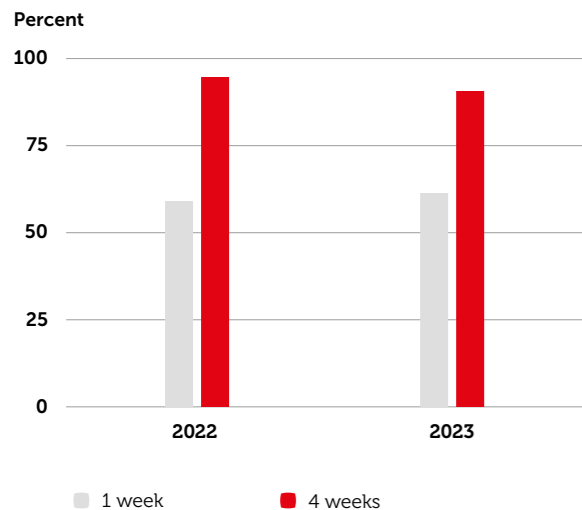


Source: eco Complaints Office, 2024

Take-down times in Germany occurred more quickly in 2023 compared to the previous year: Websites with Child Pornography hosted in Germany were offline ("taken down") within 1.86 days on average, whereas globally it took 6.17 days. The process optimization shows significant results in this context.

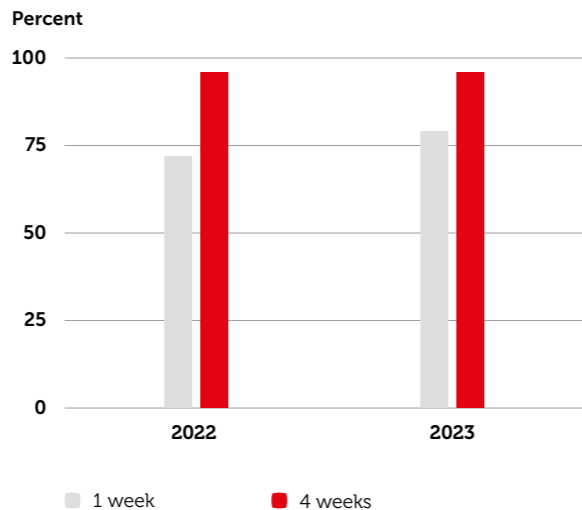
For Child Pornography content overall, a total success rate of 98.87 percent was recorded (for content hosted in Germany, this was 100 percent). Overdue take-downs were primarily caused by different legal situations with regard to texts, virtual depictions and links.

Take-Down Rates Child Pornography (Outside of Germany)



Source: eco Complaints Office, 2024

Take-Down Rates Child Pornography (All Cases)



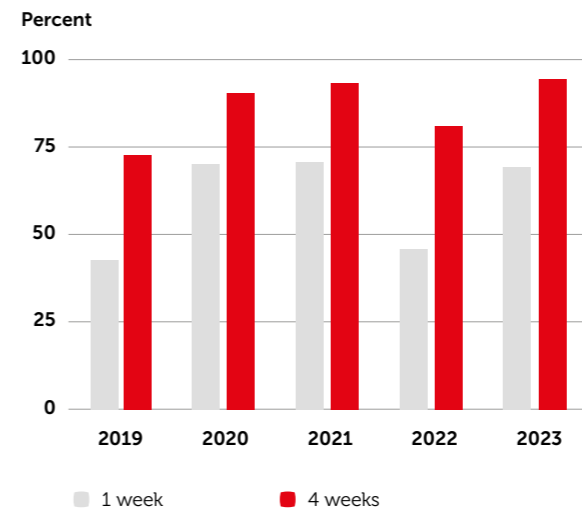
Source: eco Complaints Office, 2024

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.

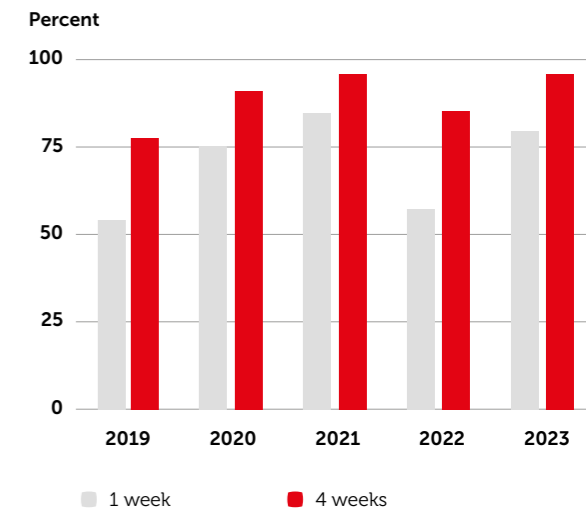
Worldwide, it took on average 5.96 days from the time that the report was submitted to eco until the content had disappeared from the Internet. Content hosted in Germany was no longer available on average after 2.24 days. (These figures also include public holidays and weekends.)

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



Source: eco Complaints Office, 2024

Take-Down Rates Depictions of Posing (All Cases)



Source: eco Complaints Office, 2024

2.4 Complaints about anti-constitutional content in detail

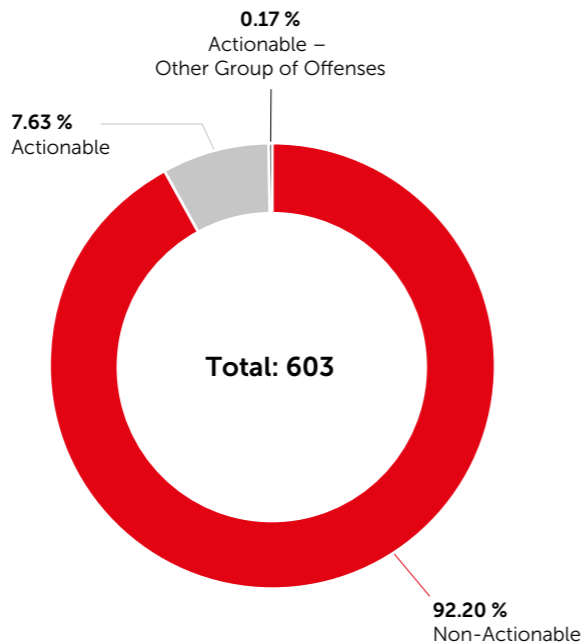
The eco Complaints Office primarily classifies the following offenses as “anti-constitutional content” (in the broad sense): incitement of the masses (Section 130 StGB), dissemination of propaganda material of unconstitutional organizations (Section 86 StGB), use of symbols of unconstitutional organizations (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), revilement of religious faiths (Section 166 StGB), and defamation directed at persons in political life (Section 188 StGB).

In 2023, the proportion of actionable complaints in this offense sector was once again strikingly low. Only around 7.6 percent of the possible anti-constitutional content reported to the eco Complaints Office was or could ultimately be classified as illegal content.

In the final analysis, the eco Complaints Office classified 46 pieces of reported content as illegal in the area of “anti-constitutional content.” This equates to 0.26 percent of all of 2023’s actionable complaints, and is similar to the classification of the previous year.

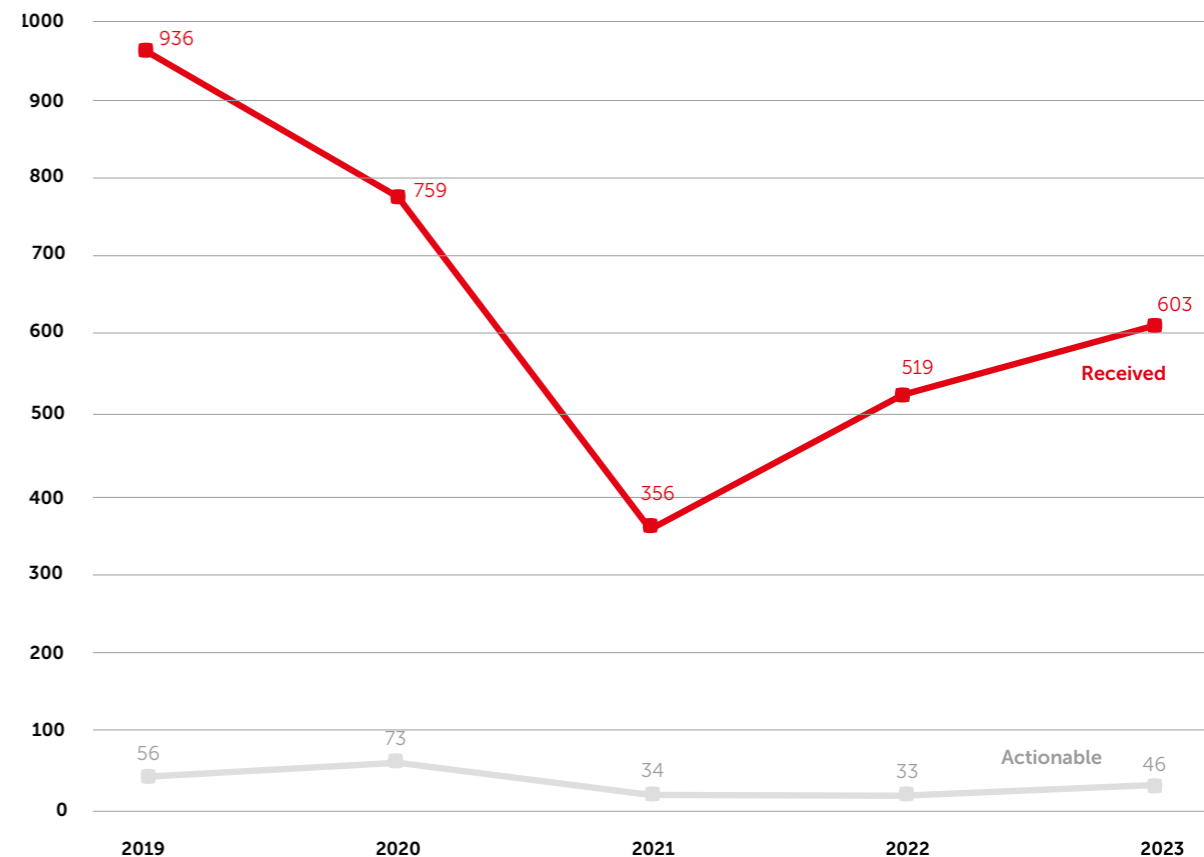
The relevant cases reported to us again covered a large number of services and/or service providers.

Proportion of Actionable Complaints on Anti-Constitutional Content (2023)



Source: eco Complaints Office, 2024

Proportion of Actionable Complaints on Anti-Constitutional Content (2019 – 2023 Comparison)



Source: eco Complaints Office, 2024

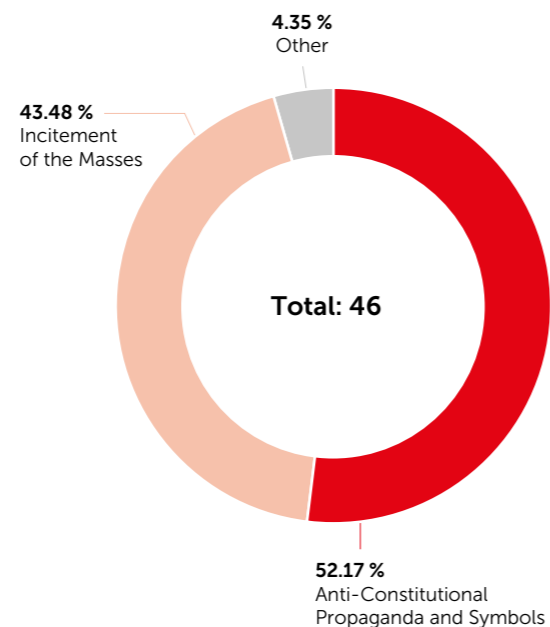
Around half of the actionable complaints concerning anti-constitutional content related to the use of un-constitutional symbols, such as the prohibited depictions of swastikas or the use of prohibited slogans.

A further 40 percent of actionable complaints were categorized as incitement of the masses. In the year under review, anti-Semitic statements, Holocaust denial, and incitement or maliciously disparaging statements against refugees were particularly prominent.

The low rate of actionable complaints in this offense sector once again makes it clear that the legal hurdles for actual violations are high, especially as a result of freedom of expression. Freedom of expression has a high value. For a statement to be prohibited, it must be more than a “nasty comment.” 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 due to being undesirable.

Due to the low number of cases in 2023 in the field of anti-constitutional content, statistical data naturally has only limited informative value. This also applies especially to information on take-down successes and reaction times in this area. Nevertheless, for reasons of transparency, a brief overview of the findings of the eco Complaints Office is provided below:

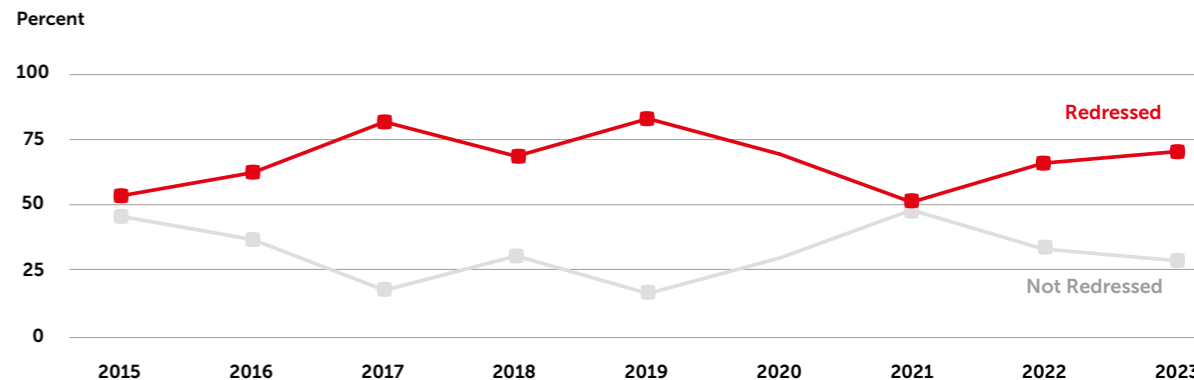
Actionable Complaints on Anti-Constitutional Content (2023)



Source: eco Complaints Office, 2024

In this year, it took an average of 5.67 days (including weekends and public holidays) from the time the ISP was notified until this reported content was no longer available. In total, 71.11 percent of the anti-constitutional content reported to the Complaints Office was removed.

Success Rates for Anti-Constitutional Content 2015 – 2023



Source: eco Complaints Office, 2024

At this point, it should also be emphasized that only one of the reported contents was hosted in Germany. In contrast to depictions of the sexual abuse of children, incitement of the masses and other anti-constitutional content is not equally prohibited around the world. In terms of the respective locations, a wide divergence exists in the legal situations. Despite this, in many cases, success (redress) could be achieved, because the hosting provider mostly took measures on the prevailing law or the company’s own T&Cs.

In comparison to depictions of the sexual abuse of children, the take-down times for anti-constitutional content are relatively long. 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.

In terms of process, the eco Complaints Office also must take account of a longer waiting period between the report being made to the police and the ISP (three working days). In addition, complaints about sexual violence and boundary violations against 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 on sexual violence and boundary violations against 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.

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; for example, 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 322,306 complaints concerning unsolicited advertising emails, which was about one third less than in the previous year.

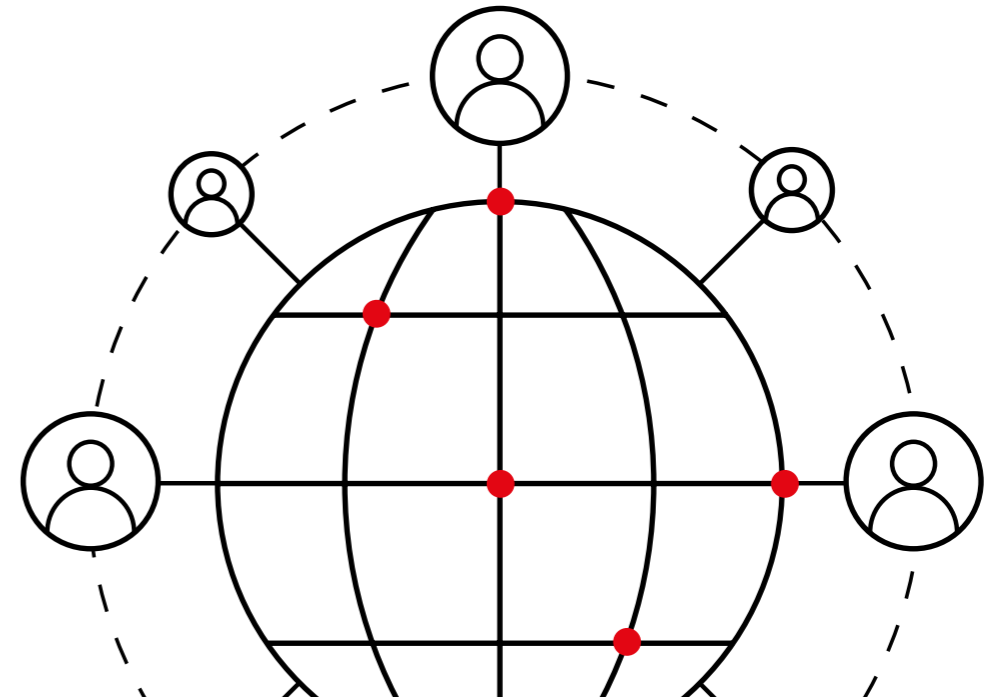


3. Our Network

Working together against illegal web content – and for the Good of the Internet: National and international partner(ships)

The effective combatting of illegal internet content is a task for society as a whole and requires good collaboration between all actors in accordance with their specific options for action. Moreover, the Internet knows no state borders. For hotlines to work effectively, it is therefore also important for them to be well connected worldwide.

For this reason, the eco Complaints Office works at both the national and international levels together with a large number of parties, relies on cooperation, and engages in committees and initiatives. In this chapter, we introduce important partners in the fight against illegal Internet content and share an overview of our diverse network activities in 2023.



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). In the year under review, INHOPE got to welcome four new hotlines as members, bringing the total number of hotlines in the network to 54 across 50 countries. Complaints concerning illegal Internet content can thus be forwarded to the relevant responsible partner through the cooperation of the hotlines. 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 collaboration of the member hotlines in the individual countries. Among other tasks, 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 member hotlines. In 2023, for example, INHOPE supported the exchange of experience between hotlines by providing financial assistance for bursary visits at partner hotlines. The eco Complaints Office

INHOPE

also benefited from this: both as a host for colleagues from Portugal, Poland, Finland and Hungary, and as a visitor at the French hotline. In addition, an “Advanced Analyst Workshop” was held, in which the eco Complaints Office also participated.

From June 2018 to December 2023, Peter-Paul Urlaub, Consultant at the eco Complaints Office, was a member of the INHOPE Executive Board and held the role of Treasurer as of July 2020.

3.2 Safer Internet Centre Deutschland (saferinternet.de)

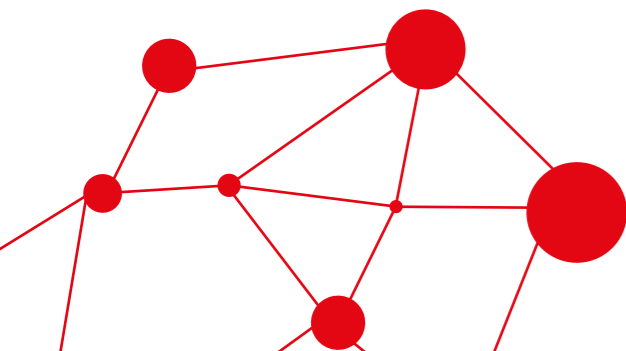
Reporting, advising, raising awareness – these are three important strands for the positive online experience of young Internet users and for combatting illegal Internet content. As such, eco, FSM, jugendschutz.net, Nummer gegen Kummer, the State Media Authority of North Rhine-Westphalia, and the State Media Authority of Rhineland-Palatinate have been working together as the German Safer Internet Centre since 2008.

Since as far back as 2004, together with the German Association for Voluntary Self-Regulation of Digital Media Service Providers (FSM), eco has been operating 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 advisors.

Last year, this initiative was also continued as part of the German Safer Internet Centre.

In addition, on the occasion of the European Day for the Protection of Children against Sexual Exploitation and Abuse on 18 November 2023, the eco, FSM, and jugendschutz.net hotlines published several small recommendations for action, as well as a “fact sheet” on the do’s and don’ts related to encountering depictions of abuse.

In 2023, the German Safer Internet Centre also continued to receive financial support from the European Union in the context of the “Digital Europe Programme.”



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 more than an impressive fifteen years. This is based on a so-called positive list for Internet sites suitable for children. This positive list has been developed by fragFINN and is regularly checked by experienced media pedagogues. In the portal “[fragFINN.de](https://www.fragFINN.de),” one of the opportunities that children are offered is a search engine which simplifies their access to Internet sites which are designed to be safe for children.

Among other forms of assistance, eco supports fragFINN through participation in its Criteria Working Group.

Participation in the working group enables the members of fragFINN to play an active role in shaping the positive list 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 on the Internet, one that can respond immediately to new developments.



3.4 Cooperation with law enforcement agencies

Criminal prosecution is a key element for combatting illegal Internet content. For this reason, in its complaint processing, eco works to ensure that illegal content is taken down and that criminal offenses are reported. The eco Complaints Office also cooperates with law enforcement agencies at both the federal and state levels in undertaking work over and above complaint processing.

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 June 2023, once again showed that the

principle of “take-down instead of blocking” and the collaboration of the hotlines, the BKA, and the German Federal Agency for the Protection of Children and Young People in the Media (BzKJ) present very effective means for combatting illegal Internet content. In addition, the collaboration with the BKA includes regular exchange meetings and a written cooperation agreement between the hotlines (eco, FSM, jugendschutz.net), the BKA and the BzKJ. This agreement has been adapted several times – most recently in the year under review – to reflect the most current developments. In the year under review, two employees of the eco Complaints Office were also able to gain detailed insights into the work of their colleagues via work shadowing at the German Federal Criminal Police Office (BKA) in Wiesbaden, and to discuss measures to further enhance cooperation.

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-Westphalia 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 of the initiative convened for a working group meeting in 2023.

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 here 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](https://www.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 enterprises (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” campaign of the North Rhine-Westphalia Criminal Police Office (LKA NRW).

3.5 Collaboration on youth media protection with other relevant actors

In 2023, the eco Complaints Office continued its exchange and collaboration with other relevant actors in the field of youth media protection. In this regard, the following activities can be highlighted:

In continuing to build on the work of previous years, the eco Complaints Office extended its collaboration on common and specific topics with the State Media Authority of North Rhine-Westphalia (LfM) and other supervisory bodies. The Complaints Office also cooperated with the LfM as part of the initiative "Prosecute, don't just delete." Furthermore, the LfM actively participated in an event organized by the eco Complaints Office on the occasion of Safer Internet Day 2023.

The German Federal Agency for the Protection of Minors in the Media (BzKJ) is another important contact partner with regard to the assurance and further development of youth media protection. In 2023, representatives of the eco Complaints Office took part in several events organized by the BzKJ as part of the "Future Workshop," addressing topics on "Sexual Violence and Harassment in the Digital Sphere," "Endangering the Capacity for Democracy," and "Loss of Control in the Digital Sphere." In addition, for many years now, employees of the eco Complaints Office have been appointed as assessors of the review body and contribute to the indexing decisions of the BzKJ.

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. Sebastian Fitting and Christian Kubiak, Consultants at the eco Complaints Office, have also been active in assessment committees as youth protection experts for USK.online since 2019 and 2022 respectively.

In 2023, "trusted flagging/reporting" was also an essential element of the eco Complaints Office's effective work, and collaborations in this area were expanded

and intensified. The special reporting channels for trustworthy whistleblowers enable direct interaction between hotlines and providers, which simultaneously has a positive effect on reaction times.

Since 2022, the eco Complaints Office has also been a member of the City of Cologne's Expert Group on the Prevention of Extremism. The eco Complaints Office also actively supported this expert group in the year under review and took part in its annual network meeting.

3.6 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, knowing how to use and handle these is not always easy, especially for children and young people.

This is why the Complaints Office makes itself available for both parents' evenings and teacher training courses, in order to raise awareness among people of legal risks and thus promote the positive use of all online services. In addition, the eco Complaints Office offers its own digital event formats.

In the year under review, the State Prevention Unit against Violence and Cyber Violence for Schools in North Rhine-Westphalia was an important cooperation partner of the

eco Complaints Office. In close collaboration (also with the Cologne Police), a joint event was organized to mark Safer Internet Day 2023. Furthermore, Sebastian Fitting, Consultant at the eco Complaints Office, participated in the "Violence Prevention in NRW" network meeting of the State Prevention Unit, where he informed attendees about the activities of the eco Complaints Office.

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 District of Neuss 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.

3.7 Special cooperation via the eco Complaints Office's partnership model

For the eco Complaints Office, collaboration with the association's companies and other partners is essential. This applies to combatting illegal Internet content in processing the reports, as well as the further activities of the Complaints Office. Each actor has specific options for action, interests or responsibilities. Together, they can act effectively and achieve a great deal. In other words: "Together for the Good of the Internet!"

In order to be able to strengthen or further develop activities and to simultaneously provide additional support to members of the association and other

companies or organizations in their various activities and interests, the eco Complaints Office has therefore developed the "For the Good of the Internet" partnership model. Supported by and in cooperation with Meta, efforts to combat illegal Internet content were promoted in the year under review. Multipliers and Internet users were made aware of risks and possible responses, and the important exchange with political actors was continued jointly in a variety of ways.

You can find further information at: <https://international.eco.de/topics/policy-law/eco-complaints-office/partnership-with-the-eco-complaints-office/>

4. Online Youth Protection for Companies

Extra benefits for member companies

Youth protection has always 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 more than 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; for example, through initial legal assessments of reports concerning illegal content. This allows complaints that are non-actionable 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 media protection.

- **Network of experts and committee work**

The eco Complaints Office represents an important voice on the subject of youth protection in all of its facets: Years of successful collaboration with law enforcement agencies, providers, partner hotlines, and actors in the field of youth media protection, not to mention the active support of national and international committees and initiatives, has made the eco Complaints Office the ideal mediator between the industry and state bodies.

- **Lasting offers for eco 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 over 25 years of expertise in the field of youth media protection. A 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 active and interested 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.

In 2023, the expert lunch meetings once again took place virtually. Two particular focal discussions related to the "Regulation on laying down rules to prevent and combat child sexual abuse" (the CSAM Regulation) and the political and regulatory efforts of other (European) countries in the field of youth media protection. Discussions also took place on current developments with regard to age verification and youth protection programs, as well as the activities and experiences of the eco Complaints Office in combatting illegal content.

The meetings planned for 2024 are also expected to take place on a virtual or a hybrid basis. In addition, teleconferences and online meetings will be offered on specific occasions if information or coordination is required in the short-term.

The following are the focal topics of our 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 Youth Protection Officers have the following functions:

- 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, association members in particular 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).



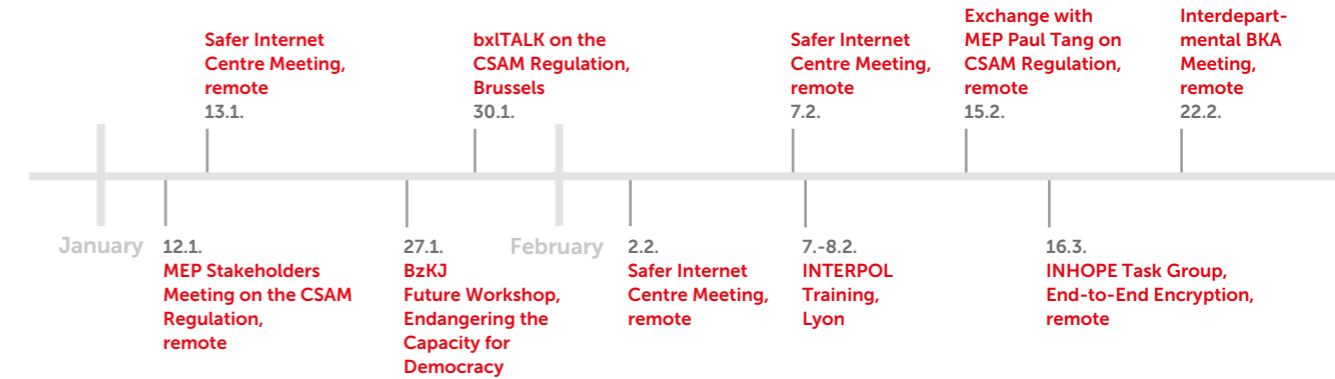
With the eco Youth Protection Officer Service, the Complaints Office provides comprehensive support to telemedia providers in fulfilling this obligation or in the voluntary appointment of a Youth Protection Officer. It offers the following functions and benefits:

- 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



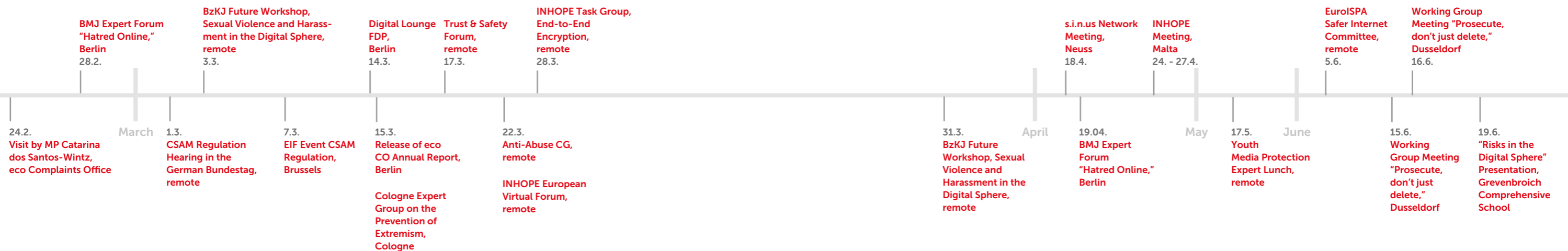
In 2023, the eco Complaints Office continued its active involvement in numerous events, activities, and committees at both national and international levels in order to advocate for efficient measures and procedures in combatting illegal Internet content, as well as for effective and practical youth media protection. The following chapter provides an excerpt of these activities.

7.2.2023

Safer Internet Day 2023

On the occasion of Safer Internet Day, the eco Complaints Office organized and conducted a joint event with the "Crime Prevention/Victim Prevention" department of the Cologne Police Headquarters and the "State Prevention Unit against Violence and Cyber Violence in Schools" in North Rhine-Westphalia. The digital workshop, which was entitled "Growing Up and Living Well Connected – Stumbling Blocks and Training Wheels in the Digital Space," primarily targeted teachers, social education workers and staff of government agencies.

With approximately 100 participants in attendance, they were supported by network partners of the eco Complaints Office – including the Hans Bredow Institute for Media Research, the EU initiative "klicksafe," the s.i.n.us network, the fragFINN e.V., the "Nummer gegen Kummer," the Entertainment Software Self-Regulation Body (USK), and the State Media Authority NRW. The participants were provided with practical and interactive information about developments and potential risks in the area of sexualized violence in the digital space and also received information on specific recommendations for action and prevention measures.



24.2.2023

Visit by MP Catarina dos Santos-Wintz

On 24 February 2023, MP Catarina dos Santos-Wintz visited the eco Complaints Office in order to engage in discussions with the hotline team about its work. The focus was on the number of complaints and successes, specific work processes, current trends and challenges, as well as staff welfare measures. The visit also provided an opportunity to discuss aspects of funding for hotlines, awareness-raising measures to promote media literacy, and the prevention of harmful conduct online. In addition, discussions took place on the potential challenges and consequences of the "Regulation on laying down rules to prevent and combat child sexual abuse" (CSAM Regulation) proposed by the EU Commission and in political discourse.

15.3.2023

Presentation of the eco Complaints Office's 2022 Annual Report

With the participation of MP Catarina dos Santos-Wintz, the Head of the Complaints Office Alexandra Koch-Skiba presented the eco Complaints Office's 2022 Annual Report at a political breakfast at the eco offices in Berlin on 15 March 2023. The eco Complaints Office had once again registered a record number of actionable complaints, entailing 8,904 cases. In 2022, depictions of sexual abuse and sexual exploitation of minors had once more accounted for a large proportion of these complaints, and the report for 2022 again highlighted that, despite a substantial number of complaints, the principle of "taking down instead of blocking" works and yields success. The eco Complaints Office was able to successfully take action against prohibited content in 97.7 percent of cases worldwide, thus building on the good success rate from previous years.

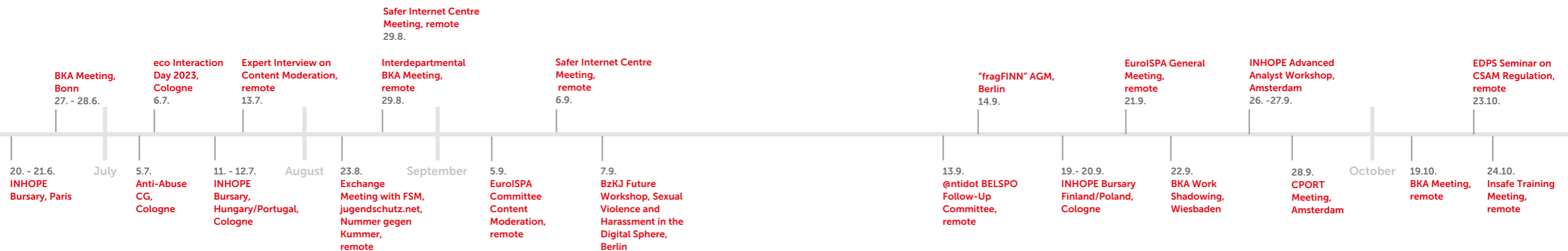
28.2.2023, 19.4.2023

Expert Forum of the Federal Ministry of Justice on "Hatred Online"

In the context of formulating a federal strategy entitled "Together for Democracy and against Extremism," the German Federal Ministry of Justice hosted two expert forums entitled "Hatred Online" in 2023. Those that were invited included representatives from legislation and law enforcement at the federal and state levels, civil society organizations, academia and the private sector. The participants examined manifestations of hatred online and discussed existing measures and the need for future

action. The first event focused on the phenomenon of hatred online and the regulation of online platforms. The second round of talks centered on those affected by hatred online, with related topics of law enforcement and consultancy.

The Head of the eco Complaints Office participated in the events and, in the discussions, contributed her expertise in dealing with reports of hatred online.



5.6.2023, 5.9.2023, 14.11.2023

Safer Internet Committee/ Content Moderation

In participating in virtual meetings of EuroISPA on the topics of Safer Internet and Content Moderation, the eco Complaints Office – represented by Head of the Complaints Office Alexandra Koch-Skiba – actively engaged in monitoring political and regulatory developments relating to combatting prohibited Internet content and content harmful to young people at the European level. Plans by the European Commission for a new legal framework in the field of CSAM also formed a significant focus in 2023. In addition, the eco Complaints Office shared its own experiences in combatting this content with EuroISPA members and provided information on regulatory developments and perspectives in Germany.

27.01.2023, 03.03.2023, 31.03.2023,

16.06.2023, 07.09.2023, 13.12.2023

BzKJ Future Workshop

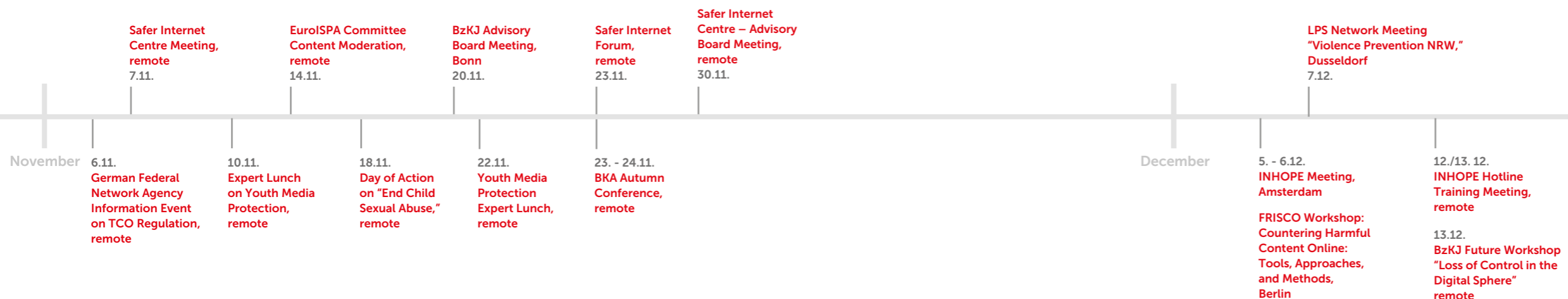
In the context of the further development of child and youth media protection, as part of the "Future Workshop" in 2023, the German Federal Agency for the Protection of Minors in the Media (BzKJ) organized several events covering topics such as "Sexual Violence and Harassment in the Digital Sphere," "Endangering the Capacity for Democracy," and "Loss of Control in the Digital Sphere." The eco Complaints Office was invited to these events, with its representatives contributing their own expertise and association positions to the discussions, while also strengthening the visibility of existing effective structures for combatting illegal content.

28.9.2023

INHOPE CPORT Data Exchange & Intelligence Forum

As one of the founding members, the eco Complaints Office is firmly integrated into the regular work of the INHOPE network of international Internet hotlines. As a result, eco always brings the experience of its hotline staff and the association's expertise to specialist or project-oriented meetings and discussions. In 2023, for example, this also applied to a forum initiated by INHOPE, which, as part of the "CPORT" project, dealt in particular on exchanging information on cases of depictions of sexual abuse of minors between hotlines, law enforcement agencies and operators of affected Internet services. The main aim was (and continues to be) to promote the exchange of information, both in individual cases and more generally about emerging trends and cross-case phenomena. In addition to trans-

mitting these insights among the participants in their daily work, a focus is placed on exchanging experiences and providing opportunities for open and trusted communication between those involved in formats such as this forum. At the forum, the eco Complaints Office was able to draw on its expertise in handling individual cases, as well as its perspective as a mediator between service providers, law enforcement agencies and international partners.



23./24.11.2023

BKA Autumn Conference

As in the previous year, the eco Complaints Office took part in the German Federal Criminal Police Office (BKA) Autumn Conference 2023. Under the motto of "Causes and Dynamics of Violence – How Do We Break the Tide?," this conference addressed issues related to the state's monopoly on violence and other fundamental principles of social co-existence. In the course of the event, specific phenomena from the perspective of victims were discussed, with a particular emphasis on preventive measures and approaches.

(CSAM Regulation) was once again the eco Complaints Office's primary topic. In addition to new obligations for providers – especially hosting providers or providers of interpersonal communication services – the regulation proposes the foundation and establishment of so-called competent or coordination authorities in the Member States, as well as a so-called "EU Centre." The establishment of new, specific bodies could have an impact on the work and the network of the established hotlines. Due to the impact on the member companies and established hotlines, this European planned legislation is therefore of particular importance for eco as a stakeholder and as a hotline operator.

12.1.2023, 30.1.2023, 15.2.2023, 07.3.2023

CSAM Regulation

From a regulatory point of view, in 2023 the European Commission's proposal for a "Regulation on laying down rules to prevent and combat child sexual abuse"

The eco Complaints Office, represented by the Head of the Complaints Office Alexandra Koch-Skiba, has highlighted the existing concerns and ambiguities regarding the Commission's draft in multiple ways and has correspondingly engaged with relevant actors. For instance,

on 30 January 2023, the Head of the Complaints Office moderated the eco bxlTalk on the CSAM Regulation, where MEPs Karen Melchior and Paul Tang, along with Ella Jakubowska (EDRI) and eco's Vice-Chair of the Board Klaus Landefeld, discussed the Commission's proposed regulations, the associated challenges, and alternative regulatory approaches. The discussion and subsequent networking focused on search obligations, web blocking, synergies with existing structures and the role of hotlines. Furthermore, on 7 March 2023, Alexandra Koch-Skiba gave a presentation at the European Internet Forum's discussion event, entitled "Child Safety Online: Fighting Child Sexual Abuse." At this event, she addressed the importance of hotlines as a point of contact for Internet users, trustworthy reporters, and cooperation partners for service providers. She also focused on voluntary proactive measures in connection with CSAM and showed how the role of hotlines and voluntary proactive measures can be integrated into the

regulatory text. With regard to the exchange with MEPs, it is also worth highlighting the participation that took place in a virtual stakeholder meeting (organized by MEPs Alex Agius Saliba, Paul Tang and Helene Fritzon) on 12 January 2023, alongside a virtual meeting with MEP Paul Tang on 15 February 2023.

On a national level, it is also worth drawing attention to the eco Digital Lounge which took place with members of the FDP parliamentary group in the German Bundestag on 14 March 2023, with one core topic under discussion relating to the proposed CSAM Regulation and its associated challenges.

6. Public Relations Work

In the year under review, the eco Complaints Office was able to further intensify and expand its successful public relations work from previous years. The working approaches, achievements and positions of the eco Complaints Office were very successfully communicated to politicians and the press through a wide variety of channels. Aside from the traditional communication events – such as the publication of the annual report, communication related to Safer Internet Day (7 February 2023), and the European Day for the Protection of Children against Sexual Exploitation and Sexual Abuse (18 November 2023) – a main focus of the eco Complaints Office's political communication in 2023 related to the proposed "Regulation on laying down rules to prevent and combat child sexual abuse" (the CSAM Regulation).

With various political papers, press releases, answers to press enquiries, workshops and other event formats, the eco Complaints Office once again underscored its position on the EU's draft regulation, drew attention to

critical points of content, and was thus able to achieve media coverage at national and international levels. The general media coverage increased considerably in 2023, encompassing 672 articles in radio, TV, print and online media.

Particularly significant attention was received by an eco survey in August regarding how to handle children's holiday photos, which was accompanied by expert tips from Alexandra Koch-Skiba, the Head of the eco Complaints Office. In this survey, she highlighted important aspects that parents should consider when posting and sending photos of children. The press release with the survey results was picked up several times by dpa and subsequently published by both national and regional media outlets, including FAZ, Süddeutsche Zeitung, Focus and Handelsblatt. Overall, the press release generated almost 400 press clippings, which represents an exceptionally large media response and once again strengthened the visibility of the eco Complaints Office.



dpa-ServiceLine vom 03.08.2023 17:04

dpa·infocom

Mediengattung: Nachrichtenagentur

Gefahr im Netz

Kinderfotos aus dem Urlaub nicht gedankenlos posten

Schwimmende Kinder im Pool, Sandburg bauen am Strand: Viele Menschen stellen gerne ihre Urlaubserfahrungen auf Instagram, Facebook, Tiktok oder in Messenger. Warum das problematisch sein kann.

Berlin (dpa/tmn) - In der Urlaubszeit teilen viele Familien gerne ihre Erlebnisse und besonderen Momente über Chatgruppen oder Soziale Medien mit Freunden und Familie. Dabei gilt es aber immer abzuwägen, was man postet und was nicht - insbesondere bei Fotos, die den Nachwuchs zeigen. Diese können nämlich bei unvorsichtigem Teilen «mitunter in Pädophilen-Foren auftauchen und in den falschen Kontext gebracht werden», warnt Alexandra Koch-Skiba, Leiterin der Beschwerdestelle beim Verband der Internetwirtschaft, eco. Das sollten Sie vor dem Veröffentlichen von Bildern im Netz bedenken:

Keine Nacktaufnahmen:

Besonders Fotos von nackt oder leicht bekleideten Kindern - etwa am Strand - könnten in falsche Hände geraten und im falschen Kontext veröffentlicht oder sexualisiert werden. Koch-Skiba empfiehlt, grundsätzlich keine Fotos zu teilen, auf denen Kinder oder Jugendliche nackt oder leicht bekleidet zu sehen sind.

Gesichter unkenntlich machen:

Wörter: 397
Ort: Berlin (dpa/tmn)

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Auch vermeintlich harmlose Bilder - etwa vor einer Sehenswürdigkeit - könnten ungewollt in falschen Kontext und im schlimmsten Fall missbräuchlich in Pädophilie-Foren auftauchen. Ein Smiley, Verpixelung oder Aufnahmen nur vom Hinterkopf beugt dem vor und schützt zugleich auch die Persönlichkeitsrechte der Kinder. Persönlichkeitsrechte von Kindern bedeuten, dass sie beispielsweise genauso wie Erwachsene das Recht haben, ihre Privatsphäre zu schützen, Zugang zu Informationen zu bekommen und ihre Meinung frei zu äußern. Nach der UN-Kinderrechtskonvention kann man diese Rechte in einem Dreieck verordnet sehen: Das Kindeswohl zwischen Schutz, Teilhabe und Befähigung

Die Rechte der Kinder beachten:

Eltern sollten ihre Kinder ohnehin in den Entscheidungsprozess einbeziehen und mit ihnen besprechen, mit wem sie ihre Fotos teilen möchten, sofern sie alt genug sind. Die frühe Heranführung an das Thema könne auch als Aufklärungsarbeit für später, wenn sie im Teenager-

Alter selbst Social Media nutzen.

Sicherheitseinstellungen überprüfen:

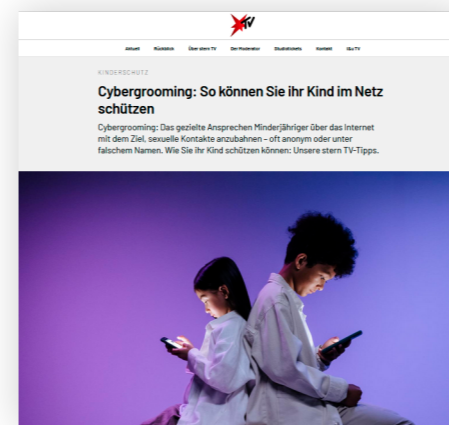
Sicherheitseinstellungen auf den gängigen Social-Media-Plattformen ermöglichen es, Fotos nur mit ausgewählten Personen oder Gruppen zu teilen. So kann die Kontrolle über die Sichtbarkeit ein Stück weit behalten werden. Der Verband rät, solche Funktionen zu nutzen. Im Zweifelsfall sollten Eltern Fotos, die sie bereits geteilt haben, wieder entfernen, wenn sie doch Bauchschmerzen damit haben.

Über die [Beschwerdestelle](#) des Verbandes kann man außerdem unangebrachte Fotos melden, die im Netz von anderen Personen geteilt wurden - auch anonym. Insgesamt ist es laut Koch-Skiba wichtig, sich bewusst zu sein, dass das Teilen von Fotos und Videos im Internet eine öffentliche Handlung ist und man sorgsam mit persönlichen Aufnahmen umgehen sollte.

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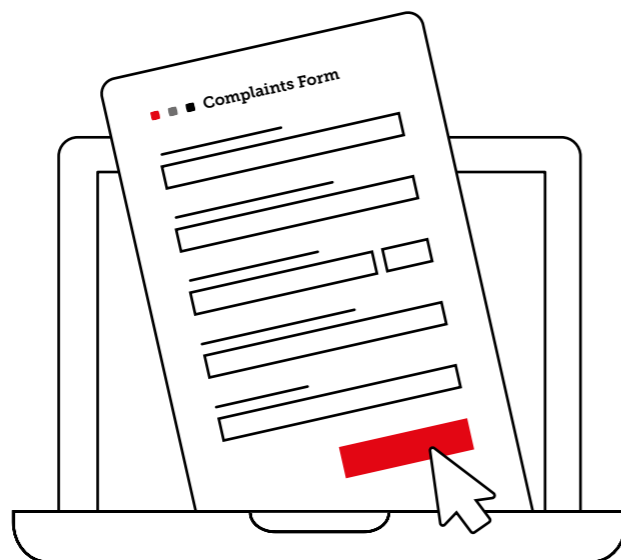




What can you do?

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

Publisher

eco – Association of the Internet Industry
Lichtstrasse 43 h, 50825 Cologne, Germany
Phone +49 (0) 221/700 048-0
Fax +49 (0) 221/700 048-111
info@eco.de
international.eco.de

Managing Directors: Alexander Rabe, Andreas Weiss

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Lichtstrasse 43 h, 50825 Cologne, Germany

Phone +49 (0) 221/700 048-0

Fax +49 (0) 221/700 048-111

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