



**eco**   

**COMPLAINTS OFFICE**

ANNUAL REPORT | 2016

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Prof. Michael Rotert  
Chairman of the Board

## Foreword

For more than 15 years, eco has been successfully fighting illegal content in the Internet, and doing this primarily through self-financing. This commitment has always been and remains important for us, as the Internet industry association, to strengthen the trust in the Internet and, in so doing, to make an important contribution to our society.

Today, digitalization has already penetrated all areas of our society and has become a central economic factor worldwide. It is clear that our future and the future of our children will be digital. Digital education will therefore become an increasingly key competence for participation in working and social life, in a society increasingly shaped by digital technologies. It is important to us that children and young people can be online without risk in their daily lives. The fight against illegal and youth endangering Internet content is therefore a challenge that eco takes very seriously.

Complaints offices are an important contact point for all Internet users: Many citizens are reluctant to report suspect Internet content directly to the police, fearing that they themselves may become part of the investigation. This is particularly the case when it comes to reports of depictions of the sexual abuse of minors.

Alongside Internet users, our members – on whose initiative the Complaints Office was established with the founding of the working group ICTF (Internet Content Task Force) in 1996 – also benefit from our service. The eco Complaints Office lawyers investigate all reports, directly filter out unjustified complaints, and thus unburden both providers and law enforcement agencies equally.

We are proud of the good cooperation we have with our members, law enforcement agencies, and other complaints offices – this network makes the eco Complaints Office the ideal mediator between the industry, the state, and Internet users. Given that together we are stronger, and that the Internet knows no national borders, it is especially important to be well connected worldwide. For this reason, the eco Complaints Office became a founding member of the international network of hotlines, INHOPE. More than 45 complaints offices from more than 40 countries, which can forward complaints to one another when the reported content is not hosted in the country where it was first reported, belong to the network. The Quality Assessment Report published annually by INHOPE was a particular highlight for us in 2016, as it demonstrated the excellence of our complaints work in all points.

The successful work is to continue in 2017: At this point, we would like to thank all our members, partners and friends for the great cooperation!

Prof. Michael Rotert,  
eco Chairman of the Board



Alexandra Koch-Skiba, Lawyer  
Head of the eco Complaints Office

## Preface

2016 was an eventful and demanding year for the eco Complaints Office. For one thing, with a view to the volume of complaints: The number of complaints received rose again in 2016, with a growth of 11.59% in comparison to the previous year. For another thing, new societal challenges are being reflected in our work. Above all, the issue of the influence of media on our society, topics like "fake news" and "hate speech" have aroused heated public debates in Germany in the last year. While the discussion was initially focused on the deletion of "hate speech", during the course of the US presidential election in November 2016 it broadened to include the deletion of "fake news". The methods for dealing with "hate speech", terrorist propaganda and "fake news", as well as the corresponding demands for deletion directed at the operators of social networks, spawned very controversial political discussions.

Even though "fake news" and "hate speech" are not defined as criminal acts, we are already well-positioned with German law: In particular, incitement of the masses, anti-constitutional propaganda, and the use of unconstitutional symbols are

prohibited and punishable offences. The dissemination of lies can also be criminally prohibited, for example, slander, and can lead to claims for damages and revocation against the originator of the statement.

However, law enforcement represents a major challenge in the case of multinational corporations, particularly when it is disputable whether or not German law is applicable. A special task, which needs to be discussed at the international level! Of course, "hate speech" was also a big topic for us, and one with which we were intensively involved. We recorded high growth in the number of complaints related to "racism": In comparison to the previous year, the number of complaints received increased by around 80%. However, complaints regarding this topic, in particular, demonstrate time and again how important a meticulous legal examination is. More than 50% of the content reported was ultimately deemed permissible and not contrary to German law, and as a result could remain online.

Not infrequently, legally borderline cases are reported, and we find ourselves walking the thin line between the freedom of expression and a statement which is relevant to criminal law. A high-quality legal assessment requires firstly time, something we should give ourselves in future: We must not allow ourselves to end up with a culture of indiscriminate deletion in the Internet.

We have been actively involved in the German Federal Ministry of Justice and Consumer Affairs' task force against "hate speech" since September 2015. We will further support the implementation of the agreed measures, in particular through working with the platform operators, and through our commitment to the rapid take-down of illegal content.

However, the discussions about "hate speech" should not belie the fact that the majority of justified complaints about web content are still, as previously, concerning child sexual abuse material. We were also able to work very successfully in this area in 2016: Around three quarters of the websites – worldwide – which eco reported with content categorized as Child Pornography, according to Para. 184b of the German Criminal Code, were taken offline within one week. In German cases, it took an average of just 1.91 days until take-down.

The many political debates in 2016 again made clear to us how important transparency is for our work. Transparency creates trust, which is why for many years we have regularly reported on the methods and success in the fight against child sexual abuse material. But we do not wish to leave it at that: I am pleased to present to you our first independent eco Complaints Office Annual Report, which describes all areas of our work in detail.

Alexandra Koch-Skiba,  
Lawyer and Head of the eco Complaints Office

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

The eco Complaints Office (<https://international.eco.de/internet-complaints-office.html>) has been fighting illegal content in the Internet for more than 15 years now. It is embedded in the system of regulated self-regulation and has, in particular, the task of improving youth protection in the Internet.

Currently the eco Complaints Office team consists of five legally trained staff members: an Internet Content Analyst, three Complaints Office Consultants and the Head of the Complaints Office.

Internet users who come across illegal, particularly youth-endangering content, can make a free and anonymous report under <https://international.eco.de/internet-complaints-office.html>, <https://www.internet-beschwerdestelle.de/en/index.html> (eco and the FSM's joint portal) or by email to [hotline@eco.de](mailto:hotline@eco.de)

In addition to this, 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 of the FSM and jugendschutz.net.

In order to effectively fight illegal online content, cooperation with other relevant players is essential. Therefore, eco cooperates with providers, partner hotlines and law enforcement agencies, among others. eco is also a founding member of the international network of complaints offices (on an international level also known as hotlines), INHOPE, and part of the German Safer Internet Center.

### 1.1 Simply and anonymously: Submitting a complaint

The eco Complaints Office accepts complaints regarding all Internet services: world wide web, emails, file-sharing, chats, newsgroups, discussion forums, and mobile content. The content can be hosted on national or foreign servers.

#### Reporting Illegal Content to the eco Complaints Office



\* The infographic gives a simplified representation of the processing of a German case

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

Incoming complaints initially undergo a comprehensive legal pre-examination. The legal assessment criteria are based in particular on the following offenses/German legal regulations\*:

- Para. 4 and 5 JMStV (youth endangering and development impairing content) as well as the corresponding criminal regulations:
  - Para. 184 et seq. StGB (freely accessible adult pornography, pornography depicting violence, animals, children or juveniles)
  - Para. 86, 86a StGB (dissemination of propaganda material and symbols of unconstitutional organizations)
  - Para. 130 StGB (incitement of the masses)
  - Para. 130 a StGB (attempting to cause the commission of offences)

- Para. 131 StGB (depictions of violence)
- Para. 176 StGB (grooming)
- Para. 201a StGB (creating or purchasing naked images of minors for profit)
- Para. 111 StGB (incitement to crime)
- Para. 7 UWG (unsolicited sending of advertising emails and newsletters)

An outline of the legal basis for the work of the eco Complaints Office can be found at: <https://www.eco.de/wp-content/blogs.dir/rechtsgrundlage-internet-beschwerdestelle.pdf>

\* JMStV: German Interstate Treaty on the Protection of Minors, StGB: German Criminal Code. UWG: German Act Against Unfair Competition

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

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

The “take-down”, or the removal of content from the Internet, is the central and most effective method in the fight against illegal, prohibited content. The method is fast, effective, and long-lasting, which is why the eco Complaints Office has followed this approach from the very beginning.

In the 17th electoral term, the German Federal Parliament also decided to, alongside rigorous law enforcement, follow the principle of “take-down rather than blocking” in the fight against Child Pornography, according to Para. 184b of the German Criminal Code, in the Internet, a principle which eco has consistently supported for years. With an almost unanimous

decision, the German Parliament concluded the long-standing discussion on Internet blocking as proposed by Ursula von der Leyen on 1 December 2011, by ultimately abolishing the Access Impediment Act, which came into force in February 2010.

### 1.4 Measures taken by the eco Complaints Office

After examining the content, action is taken depending on the severity of the offence and the location of the server:

**Punishable content hosted in Germany** is always reported to the police. In addition, the eco Complaints Office requests 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 German provider will be required to ensure that the content is made legally compliant.

**Content hosted abroad** is 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. 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 police, if the given content is punishable internationally or is subject to universal jurisdiction as foreseen in the German Criminal Code.

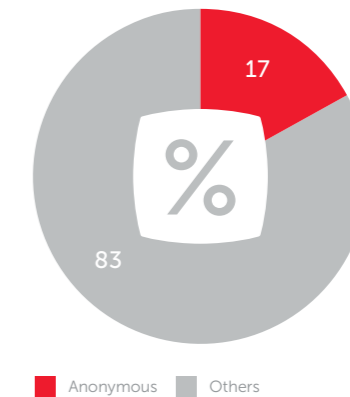
## 2. Complaints 2016: Facts and Figures

### 2.1 Number of complaints and measures taken 2016

In 2016, the eco Complaints Office received a total of 249,324 complaints. This was again an increase in the number of reports by 11.59 % in comparison to the previous year.

For years, the majority of complaints have been in regard to the unsolicited sending of email marketing ("spam") and images of the sexual abuse and sexual exploitation of minors. This was also the case in 2016. Disregarding reports of "spam", the majority of reports related to images of the sexual abuse and sexual exploitation of children, as defined in Para. 184b of the German Criminal Code as Child Pornography.

**Proportion of Complaints Submitted Anonymously (Disregarding Spam or Usenet)<sup>1</sup>**

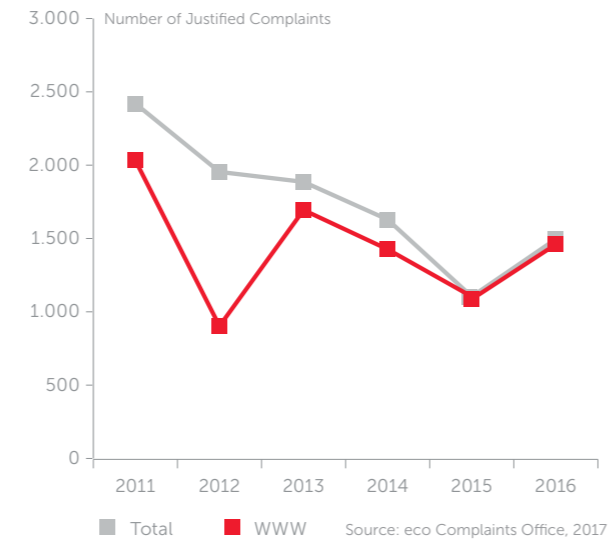


Source: eco Complaints Office, 2017

<sup>1</sup> Reports on spam are not taken into account, as the submission of a complaint regularly occurs through the forwarding of the respective marketing email and, as such, in general with the transferal of an email address. Reports on Usenet content are not taken into account, as these were, almost without exception, submitted by a partner hotline in 2016, as part of a long-term cooperation.

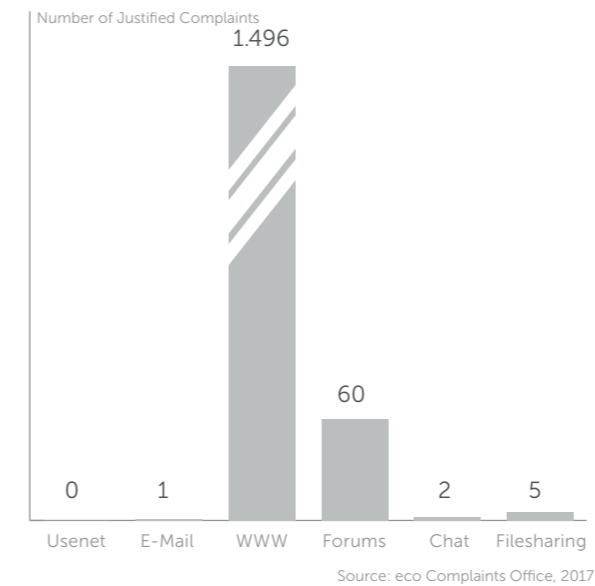
Excluding complaints about pure spam, the eco Complaints Office took action in 1,564 cases (= justified complaints) in 2016. This corresponds to 44.67 % of complaints received. It should be taken into account that the Complaints Office regularly receives reports which fall outside its mandate for processing, which in turn influences the ratio of reports submitted and justified complaints.

**Development: Justified Complaints**

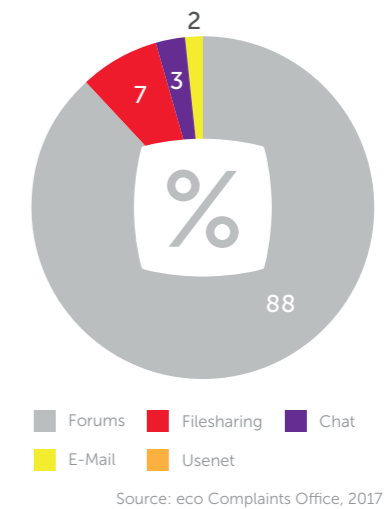


The majority of justified complaints dealt with – as in the previous three years – web-based content.

**Justified Complaints According to Service 2016 (Without Spam)**

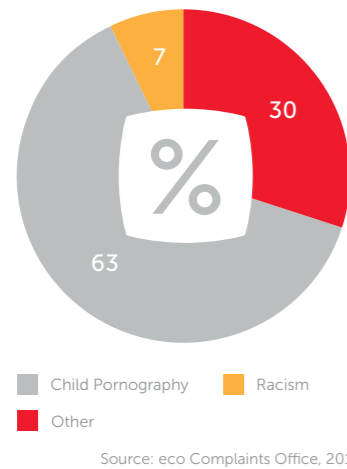


**Justified Complaints 2016 by Service (Without WWW)**

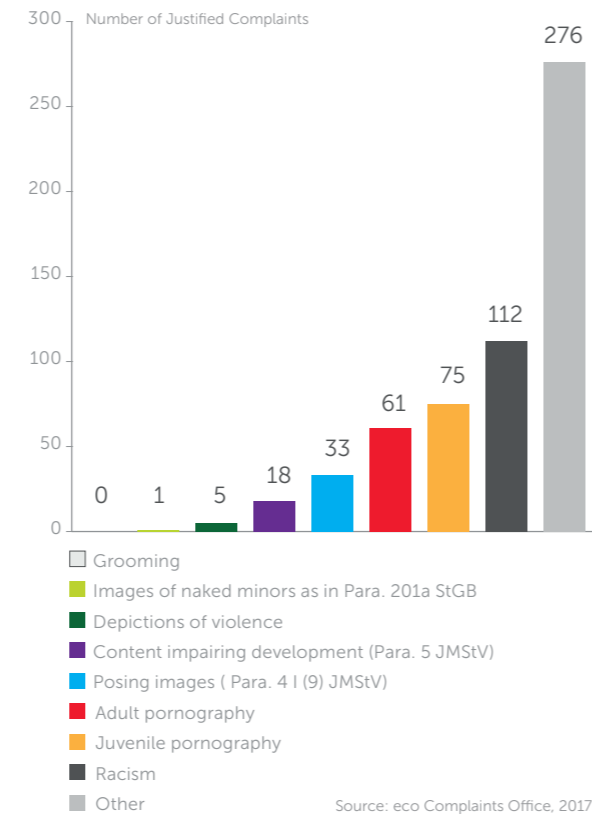


From a content perspective – as in previous years – most complaints dealt with images of the sexual abuse and sexual exploitation of children, as defined in Para. 184b of the German Criminal Code as Child Pornography.

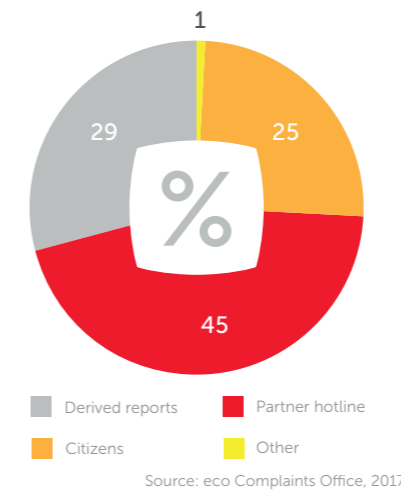
### Justified Complaints (Without Spam)



### Justified Complaints (Without Spam and without Child Pornography)

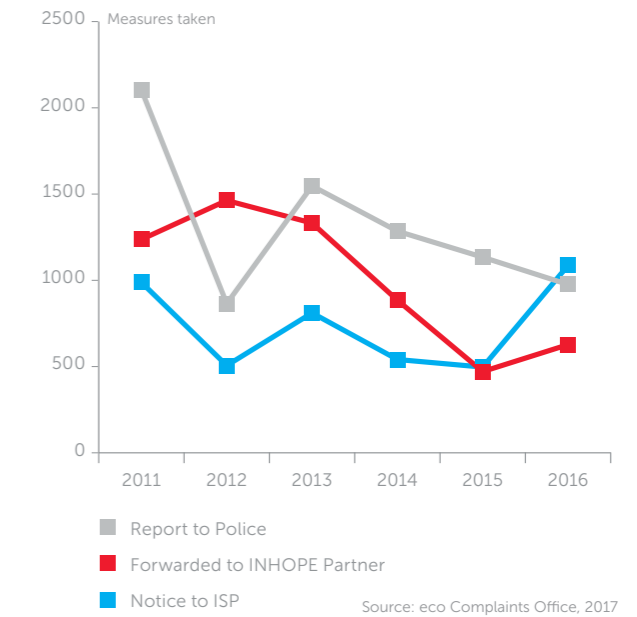


### Source of Justified Complaints 2016



In total, the eco Complaints Office sent 2,689 notifications to police, INHOPE partner hotlines, and/or ISPs – not including reminders – in 2016.

### Measures Taken in Comparison (2011 - 2016)



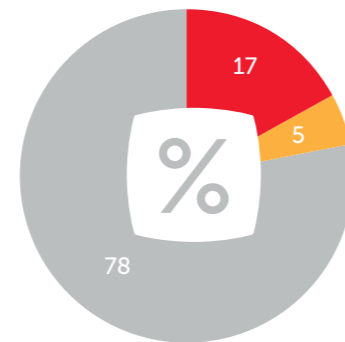


### 2.2 Success rate for web-based content

Over three quarters of the content reported was taken down or otherwise legalized (e.g. through the implementation of an age verification system), in just about 5% of the cases, the reported URL was initially moved to another provider (so-called "moved cases").

This demonstrates that self-regulation works – also internationally. Only around one third of the reported URLs (29.89%) were hosted in Germany.

Ratio of Redressed to Not Redressed Cases (2016)



Redressed Not redressed Moved

Source: eco Complaints Office, 2017

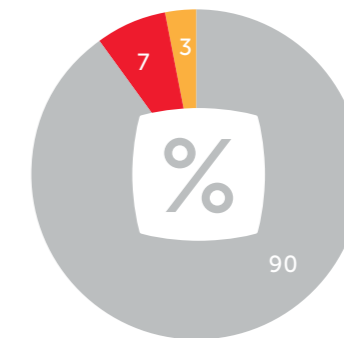
### 2.3 Complaints about images of the sexual abuse and sexual exploitation of minors in detail

From the total of 1,091 cases from the area of images of the sexual abuse and sexual exploitation of children and minors, the majority of complaints were regarding content that qualified as Child Pornography as defined in Para. 184b of the German Criminal Code.

Since January 2015, the offense of Child Pornography makes provision for three different varieties: images of the sexual abuse of children, images of partially or completely naked children in unnatural sexualized poses and the sexually provocative reproduction of the naked buttocks or genitalia of children. Somewhat more than 2/3 of the justified Child Pornography complaints in 2016 concerned the first variety (images of the sexual abuse of children).

Almost one third (32.17%) of the justified complaints about images of the sexual abuse and sexual exploitation of children and minors pertained to images of Posing. Posing is defined as images of children and minors in unnatural sexualized poses. 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 (Para. 4 (1) 9, German Interstate Treaty on the Protection of Minors (JMStV)) or (since 27 January 2015) is punishable as Child or Juvenile Pornography (Para. 184b (1) 1b and Para. 184c (1) 1, German Criminal Code).

Representations of Sexual Abuse and the Sexual Exploitation of Minors in Detail (2016)



Child pornography Juvenile pornography Posing images (Para. 4 I (9) JMStV)

Source: eco Complaints Office, 2017

### 2.3.1 Notable challenges in 2016

From a technical perspective, among others, fast-flux cases and referrer cases caused the most difficulties. The so-called fast-flux technique is used to hide the hosting location of a website; it is, for example, also used by botnets. Here, a fixed domain is allocated to numerous IP addresses which are continuously changing on rotation. The consequence is that location queries can – in intervals of only a few minutes – return different results. This can considerably complicate the Notice and Takedown process.

Images 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.

Legally, the boundary between the different varieties of offence in relation to Child Pornography as defined in Para. 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 poses not infrequent challenges. For example, an assessment of the age of a child, or when a child is partially naked.

A further challenge is presented by the different legal situations of countries, particularly in the area of Posing, virtual CSAM and links to CSAM.

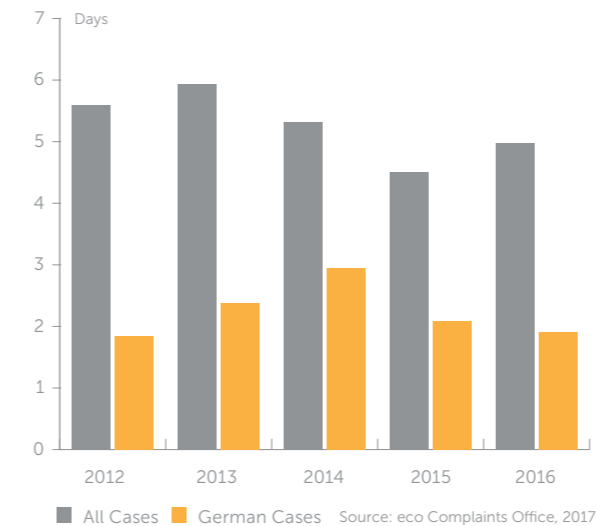
In addition to this, one hosting provider consistently ignored every notice from us (and from others), as well as the request for the take-down of content, regardless of the content involved.

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

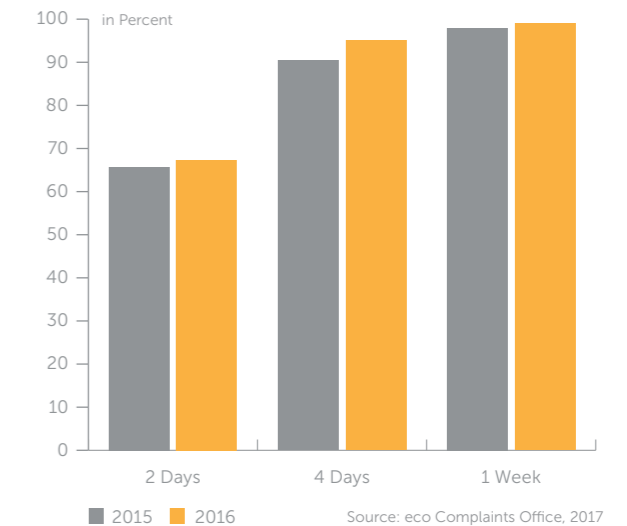
It should be taken into account for the following figures and graphs on reaction times for Child Pornography web content, as well as for cases of Posing and racism, that these do not necessarily represent the effective or actual reaction time of the Internet service provider, but rather the time from eco receiving the report until verification by eco of take-down.

Here, the checking frequency 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. eco checks for take-down as a rule on week days and does not remove weekends and public holidays on which eco does not

**Average Duration Until Take-down in Annual Comparison (Child Pornography)**



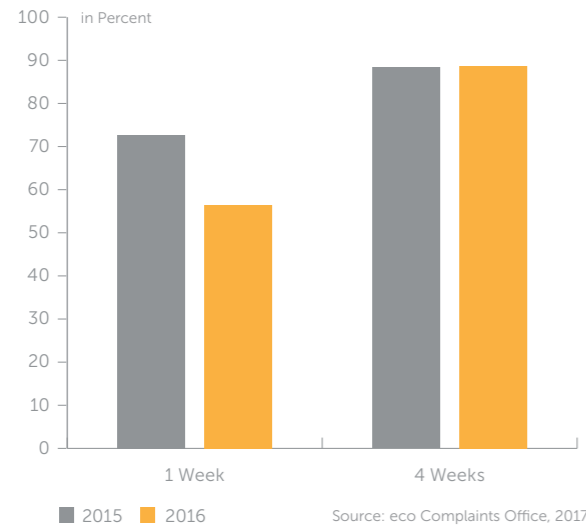
**Take-down Quotas Child Pornography (German Cases)**



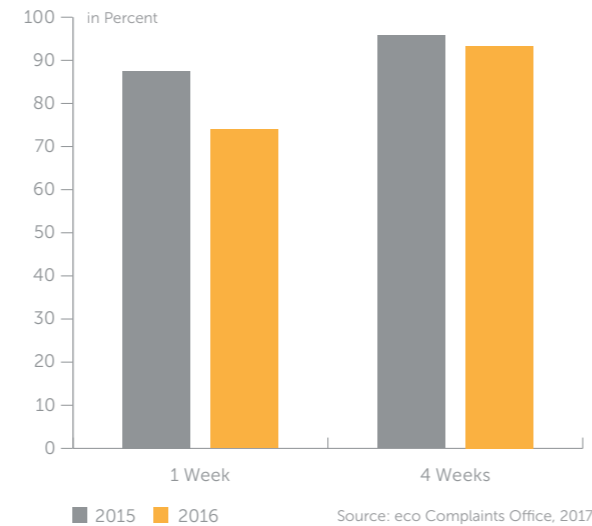
work from the calculation of the accessibility and success rates. In comparison to previous years, constant short take-down times could again be ascertained. Websites with Child Pornography hosted in Germany were offline within 1.91 days on average ("taken down"), whereas globally, it took 4.97 days.

Of these, around 60% of cases were no longer available online after 2 days (for German cases) or 1 week (for cases outside of Germany).

**Take-down Quotas Child Pornography (Outside of Germany)**



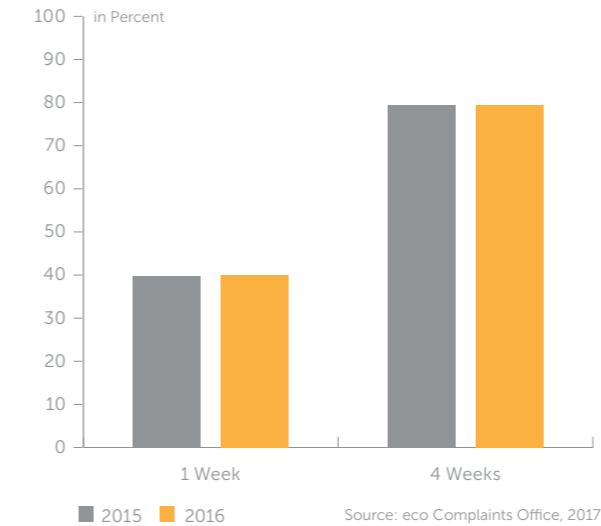
**Take-down Quotas Child Pornography (All Cases)**



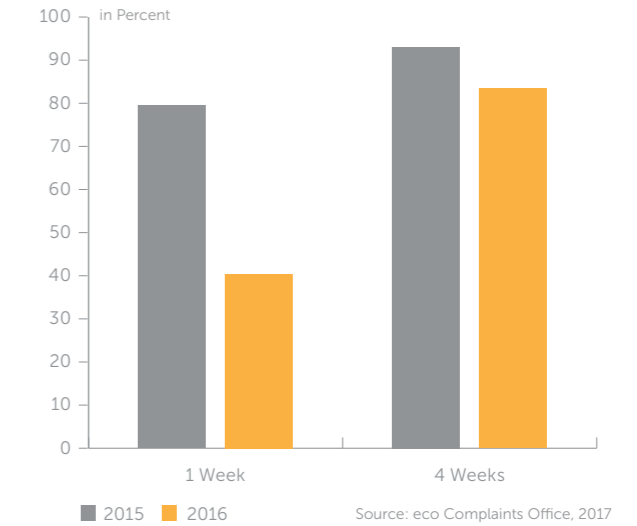
### 2.3.3 Overview of reaction times for web-based Posing cases

Worldwide, it took on average 7.34 days from the report being submitted to eco until the content had disappeared. Content hosted in Germany was no longer available on average after 3.01 days. (These figures also include public holidays and weekends.)

**Take-down Quotas Posing Cases (Outside of Germany)**



**Take-down Quotas Posing Cases (All Cases)**



### 2.4 Cases of racism in detail

In 2016, 7.16% of justified complaints (112 cases) were regarding the area of illegal, racist content. Of these, around two thirds of the complaints are categorized as incitement of the masses.

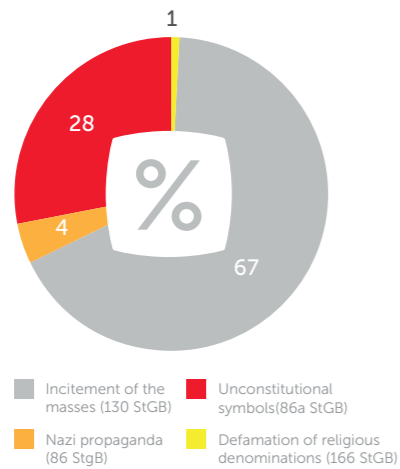
Fewer than half of the cases (44.64%) were clear violations, while in the other cases an intensive legal assessment was required.

The relevant cases reported to us pertained to numerous services.

The comparatively low proportion of justified complaints in this area is striking.

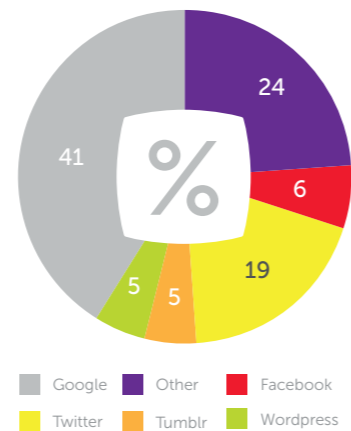
important a thorough and – as a result – time-consuming assessment of the content is, so that the freedom of expression can be ensured within the framework of existing law, and that permissible statements cannot simply be deleted as undesirable.

Racism/“hate speech” in Detail (2016)



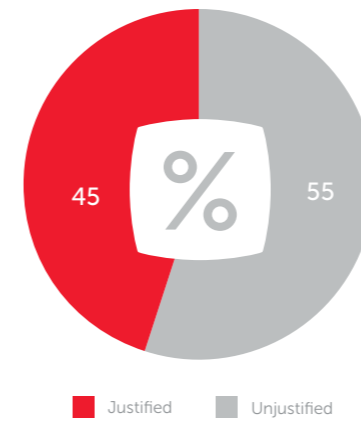
Source: eco Complaints Office, 2017

Distribution of Racism Complaints by Service (2016)



Source: eco Complaints Office, 2017

Ratio of Submitted to Justified Racism Complaints (2016)



Source: eco Complaints Office, 2017

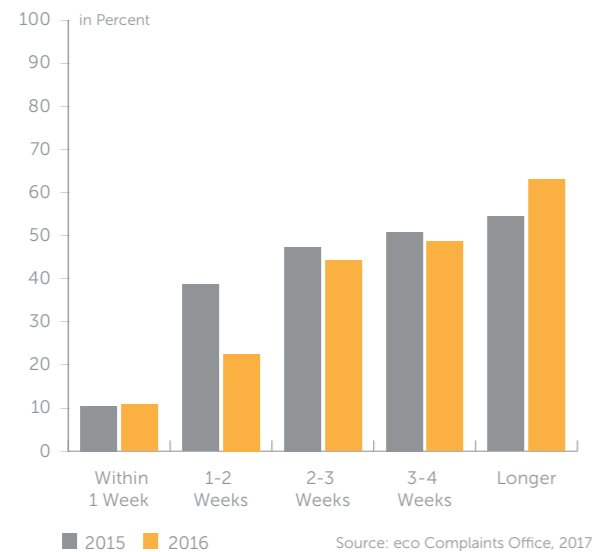
This makes clear that complainants are sensitive to possible legal infringements in this area. At the same time, it is clear that the legal hurdles for actual violations are high, particularly as a result of the freedom of expression. This again shows how

### 2.4.1 Overview of the reaction times for web-based racist content

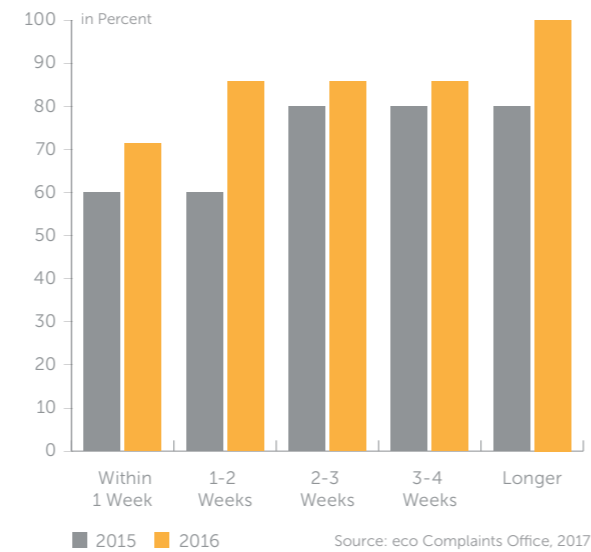
The following figures concern in particular complaints regarding incitement of the masses (Para. 130, German Criminal Code), the dissemination of propaganda material from unconstitutional organizations (Para. 86, German Criminal Code) and the use of symbols of unconstitutional organizations (Para. 86a, German Criminal Code).

In total, there was a significant increase in the success rate for cases of racism in 2016. In 63% of cases, the reported content was taken offline, in comparison to "only" 54% in 2015. In this respect, it should be emphasized that only 6% of the cases of reported content were hosted in Germany. In

#### Take-down Quotas: Racism (All Cases)



#### Take-down Quotas: Racism (Germany)



### 2.5 Processing of complaints of spam

contrast to images of the sexual abuse of children, incitement of the masses and other racist content is not equally prohibited around the world. Despite this, in around two thirds of cases, success (=redress) could be achieved through informing the hosting provider, who then took measures on the basis of prevailing law or the company T&Cs.

The eco Complaints Office also follows a self-regulatory approach when it comes to the processing of complaints about the impermissible sending of marketing emails and newsletters. The senders of such emails are informed of the legal requirements for permissible email marketing – with a request for compliance. If required, the addressing of the provider used for the sending of emails can be signaled, and 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.

Content hosted in Germany was no longer accessible, on average, 8.26 days (including weekends and public holidays) from the report being received by the eco Complaints Office. Content hosted abroad was, on average, no longer available 20.24 days from the report being received by the eco Complaints Office (here again, public holidays and weekends are not excluded from the calculation).

In the case of complaints about the sending of marketing emails and newsletters that pertains to one of the senders participating in the whitelisting project, the Certified Senders Alliance (CSA), there is more intensive processing of the complaint. With the agreement of the complainant about the forwarding of his/her data, 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 will be taken to ensure compliant sending in future.

The relatively long take-down times in comparison to images of the sexual abuse of children is, among other things, because the eco Complaints Office must take account of a longer waiting period between the report being made to the police and to the ISP (72 hours instead of 6 hours). In addition, the legal assessment is not always trivial – complex cases require a thorough and therefore also a more time-consuming legal examination. Different legal situations in different countries can also lead to a more time-consuming examination and greater need for clarification and consideration, and can thus have an influence on the take-down times.

## 3. Our Network

### Nationally and internationally connected: Together for a safe Internet

The Internet knows no state borders – for the complaints offices to work effectively, it is therefore important to be connected worldwide.

#### 3.1 INHOPE

Given that effectively fighting illegal Internet content can only be achieved through international cooperation, eight organizations, including eco, with support from the European Commission's Safer Internet Action Plan, founded INHOPE (International Association of Internet Hotlines) in November 1999. INHOPE is the international umbrella association of Internet hotlines, which operate worldwide and accept complaints about illegal online content in particular, child sexual abuse material.

In the network, which now consists of more than 45 hotlines in over 40 countries, national hotlines can forward complaints to the responsible INHOPE partner. In this way, complaints can be investigated in the respective country of origin. Complaints about illegal online content which is not hosted in Germany are therefore forwarded by eco to the respective INHOPE member. This process has proven itself: The majority of countries in which images of the sexual abuse and the sexual exploitation of minors are hosted have a hotline that is a member of INHOPE.

The network is growing constantly and takes in new hotlines every year. The rapid and secure exchange of information over borders has already led to the breaking up of numerous child pornography rings.

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



#### 3.2 German Safer Internet Center (saferinternet.de)

Since 2004, the eco Complaints Office, together with the Voluntary Self-Control of Multimedia Service providers (FSM e.V.), operate the portal [www.internet-beschwerdestelle.de](http://www.internet-beschwerdestelle.de), to offer Internet users a joint point of contact for reports of illegal Internet content, as well as providing further information and links to further advice. Since 2008, it has been part of the German Safer Internet Center (saferinternet.de) – together with klicksafe, jugendschutz.net and "Nummer gegen Kummer". The German Safer Internet Center is co-funded by the European Union as part of the "Connecting Europe Facility".



#### 3.3 fragFinn.de

FragFINN e.V., of which eco is also a founding member, offers a protected surfing space for children, 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](http://fragFinn.de)" children have access, among other things, to a search engine which simplifies access for them to Internet sites which are designed to be suitable for children.



### 3.4 Network “No grey areas on the Internet”

In November 2014, the German Federal Ministry for Family Affairs, Senior Citizens, Women and Youth presented the network “No grey areas on the Internet” against the abuse and sexual exploitation of children: The network works to fight against images of children and young people in sexual poses and to have this prohibited internationally. In the focus of the network is a competence center to highlight the grey zones in sexual exploitation in the Internet. The eco Complaints Office actively supports the work of the network, in 2016 by exchanging experiences with the competence center in dealing with images of children in sexually explicit poses, as well as starting with the analysis of paths and strategies of dissemination, especially with regard to Usenet. This work and the comprehensive processing of reports of images of minors in sexually explicit poses in the Internet, along with the recording of statistics and analysis is funded by the German Federal Ministry for Family Affairs, Senior Citizens, Women and Youth.

### 3.5 Cooperation with law enforcement agencies

The eco Complaints Office has worked well with law enforcement agencies like the German Federal Criminal Police Office (BKA) for years. Among others, the German Federal Government has been documenting the success of measures for deletion in an annual report since 2013: The figures show that the principle of “take-down rather than blocking” and the cooperation of the complaints offices, the BKA, and the Federal Review Board for Media Harmful to Minors are very effective means for combatting illegal Internet content.

The eco Complaints Office is also active at the local level – one example is “SUSII” (Smart-und-Sicher-im-Internet), a new safety and security project that eco established together with the Cologne Police Headquarters in October. SUSII is a free and non-commercial Internet safety and security portal, targeted at citizens of Cologne, as well as Small and Medium-sized Enterprises (SMEs).

## 4. Online Youth Protection for Companies

### Benefits for member companies

- Legal expertise

The eco Complaints Office offers eco member companies continual support, e.g. through initial legal assessments of complaints. This allows unjustified complaints to be filtered out so that providers do not have to deal with them.

- Politically active

We use our extensive know-how and experience in our political lobby work at both national and international levels. With our complaints office work on an international level, we are always very in tune with political and policy developments. We observe processes and debates and recognize – and can react to – new impulses immediately.

- Network of experts and committee work on national and international levels

The eco Complaints Office as your voice: years of successful cooperation with law enforcement and other complaints offices, 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.

- Sustainable offers in the field of youth media protection

In addition to the full legal qualifications of our staff who assess online content and any measures to be taken, member companies can profit from 20 years of expertise in the field of youth media protection.

The eco Complaints Office offers further services, separate from the everyday work of dealing with complaints. Since 2016, for example, the eco Complaints Office has offered an external youth protection officer service.

If you are interested in availing of this service, please contact [jugendschutzbeauftragte@eco.de](mailto:jugendschutzbeauftragte@eco.de).

## 5. Events, representation and political work 2016

The eco Complaints Office was "on location" again in 2016 to report on its works, challenges and successes, and also to discuss current and future trends. Here is a selection of our activities in 2016:

- **Political Breakfast in Brussels: Europe needs to go for "take-down rather than blocking"**

In January, eco organized a Political Breakfast in the EU Parliament, which was hosted jointly with Sabine Verheyen (MEP). Members of the European Parliament and their staff and representatives of member companies were among those who took part. They came to inform themselves about combatting child sexual abuse material (CSAM) online. One topic addressed at the breakfast was the changes introduced in January 2015 to German criminal law in relation to the crime of "child and juvenile pornography". Alexandra Koch-Skiba, Head of the Complaints Office, introduced the eco Complaints Office and how it works, reported on current deletion rates and speed and explained the background to EU funding for hotlines under the Connecting Europe Facility (CEF).

- **eco encourages media competence among adolescents and supports the German federal youth competition "My Digital World"**

The eco Complaints Office supports media competence for children and adolescents in the Internet. 120 schoolchildren from the German town of Norf won a workshop day on Internet and data security, as part of the German federal youth competition "My Digital World", which eco actively supported. In various workshops, the schoolchildren could develop their knowledge of IT security with a playful approach. eco's workshop had the motto "Competent Kids Online" and looked at the topic of media competence. In two topic-based sessions, the young participants came up with answers to various issues, such as e.g. data protection, malware, secure passwords, and faked identities in social media. At the end, the schoolchildren tested their knowledge of how to use the Internet responsibly in a quiz and answered questions on the topics in videos they made themselves. All participants who completed the workshop received a certificate of competence.

- **Combatting Child Sexual Abuse Material (CSAM): The European Party EPP invited experts to Brussels**

The European People's Party (EPP) explored current developments in combatting CSAM online. Representatives of Interpol, Europol, and the European Commission reported on current developments and new challenges.

The eco Complaints Office was represented by the eco Board Member for Policy & Law, Oliver Süme. In his talk, he gave an insight into the cooperation between Internet and social media companies, law enforcement and the hotlines. As an example, Süme spoke about the work of the eco Complaints Office over the last 15 years in successfully combatting CSAM and other illegal online content.

- **10th International Conference: "Keeping Children and Young People Safe Online"**

The German and Polish Safer Internet Centers organized their 10th joint conference "Keeping Children and Young People Safe Online" in September 2016 in Warsaw. In talks, workshops and debates, the over 600 participants from the fields of education, politics, industry, law enforcement, and youth protection explored current developments in the areas of youth media protection and Internet safety. As part of the series of talks on "how to protect children against harmful content", the eco Complaints Office and representatives of jugendschutz.net spoke about the topic of "hate speech", where it comes from and its definition, as well as the legal possibilities to combat "hate speech".



- **Together against hate crime online- where do we stand?**

In September, the German Justice Minister Heiko Maas and the EU Commissioner Vera Jourová discussed effective measures to combat illegal hate messages with academics and representatives of leading companies in a conference at the German Federal Ministry of Justice and Consumer Protection. In December 2015 already, the Task Force, to which eco belongs, agreed on measures in regard to dealing with illegal hate messages in the Internet, with the aim of removing illegal content more quickly from the Internet in future.

- **Political Breakfast: Deletion success in combatting material showing sexual abuse and sexual exploitation**

As part of the eco Political Breakfast in October, Alexandra Koch-Skiba, head of the eco Complaints Office, took stock and reported in detail about the work and successes of the Complaints Office. She took the guests through the current numbers of complaints, the challenges in dealing with complaints, as well as the success rates in deleting CSAM and posing images. When compared with previous years, there was a significant increase in the number of complaints. Also notable was the shift away from images of adolescents towards CSAM over the years. The constantly quick reaction times of the last few years show that the self-regulation approach, the cooperation with the providers, the umbrella organization INHOPE and the German Federal Criminal Police Office (BKA) is more successful than ever: 100 percent of justified complaints were removed from the Internet in Germany within two days.

- **Parliamentary Evening: eco Complaints Office in the age of "hate speech" & co.**

In November, eco invited the Working Group Digital Agenda of the CDU/CSU parliamentary group in the Bundestag to a Parliamentary Evening in eco's Capital Office. In this exclusive setting, the Head of the eco Complaints Office, Alexandra Koch-Skiba, presented the work of the complaints office network in Germany and Europe and discussed the greatest challenges in dealing with illegal content online. Against the background of the current calls for stricter measures against "hate speech", there was a strong focus in the discussion with the Members of the Bundestag on the legal framework for dealing with hate comments, particularly in view of the sensitivity of freedom of expression according to Article 5 of the German Basic Law.

- **State Secretary Gerd Billen thanked the Internet complaints offices**

In December, State Secretary Gerd Billen (German Federal Ministry of Justice and Consumer Protection) visited the representatives and staff of the three German complaints offices in the eco Capital Office and thanked them for the successful and important work done in more than 15 years. Billen commended the staff of the complaints offices for their highly responsible contribution to society, with their support for providers and Internet service operators in dealing with illegal online content. In doing so, they ensure the representations of the sexual abuse of minors as well as racism and incitement of the masses are quickly taken offline.

## What can you do?

Every report counts in the fight against illegal content! In 2016, the eco Complaints Office was responsible for CSAM websites hosted in Germany being taken down within 1.9 days – including weekends and public holidays. If you come across content online that you believe is illegal, don't hesitate to report it to the eco Complaints Office – simply and anonymously. <https://international.eco.de/internet-complaints-office.html>



The work of the eco Complaints Office is funded by the European Union's Connecting Europe Facility and by the German Federal Ministry for Family Affairs, Senior Citizens, Women and Youth:



**Co-financed by the European Union**

Connecting Europe Facility



Federal Ministry for  
Family Affairs, Senior Citizens,  
Women and Youth

### Legal Notice

#### Publisher

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