

**eco**     
COMPLAINTS OFFICE

**Annual Report 2021**

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## Foreword June Lowery-Kingston

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

Our society is in the midst of a digital transformation which is permeating ever more spheres of life. Which guiding principles should be used to shape this process? The "European Declaration on Digital Rights and Principles for the Digital Decade" sets out the guiding principles for making the transformation sustainable, people-centered, and value-based. The declaration also incorporates the special needs of children and young people. On this basis, they should be empowered to make safe and informed decisions in the online environment and to bring their creativity to the fore. In the digital environment, children should be protected from exploitation, manipulation, abuse, and criminal offenses, which also includes being confronted with harmful and illegal content.

The well-being of children is close to the heart of the European Union. Over the past two years, the European Commission has adopted a number of initiatives that work towards the well-being and protection of children, as well as initiatives which are not exclusively focused on children's well-being, but which will bring about improvements for children and young people. More important regulations will come on board in 2022. With these measures, the Commission also intends to deliver a solid foundation for the work of hotlines. This will provide sustainable support for the work of eco and the other German hotlines.

The Digital Services Act is expected to be adopted by the European institutions in the course of 2022. The act contains a series of measures which have been designed to increase the effectiveness and efficiency of combatting illegal content on the Internet. For example, the Commission's proposal aims to remove disincentives

that hinder service providers in undertaking voluntary initiatives to detect, take down, or block access to illegal content. Trusted reporters, so-called "trusted flaggers," will be granted a privilege; their reports must then be prioritized and processed without delay. This will have a concrete impact on the work of the hotlines and lead to an acceleration of reporting procedures.

The Digital Services Act introduces horizontal regulations intended to combat illegal content of all kinds on the Internet. Such horizontal measures are to be supplemented by various individual regulations for the protection of children. In addition, there are targeted legislative measures for tackling criminal offenses against children. In 2020, the Commission adopted the "EU Strategy for a More Effective Fight against Child Sexual Abuse." This strategy sets out a series of measures to protect children, both in the preventive and reactive fields. It has announced a legislative initiative that will supplement

the existing legal framework, involving further rules specifically introduced to combat child abuse images on the Internet. It also aims to strengthen the work of hotlines; to provide a strong legal basis and a framework that facilitates coordinated action among the many actors involved. The Commission's proposal is planned for the current year.

Last year, the Commission adopted another landmark document: the "EU Strategy on the Rights of the Child." It is the first comprehensive European strategy for children and addresses numerous issues, including combatting violence against children and child sexual abuse. In addition, the Commission has proposed to accompany the strategy with another initiative, the "European Child Guarantee," which will promote equal opportunities for children at risk of poverty or social exclusion.

Ten years ago, the Commission adopted the “European Strategy for a Better Internet for Children.” It was the first comprehensive policy framework of its kind in the EU, and it not only shaped the policies of the Member States, but also attracted worldwide attention and set global standards. It goes without saying that what is available on the Internet and children’s user behavior have evolved significantly over the past decade. In 2022, the Commission will therefore adopt a revised strategy which adapts to the new challenges. It will support the practical implementation of existing legal instruments for the protection of minors on the Internet, build on multi-stakeholder cooperation, and set out a comprehensive approach to online safety for children. Topics for the next few years will not only include age-appropriate content, promoting digital literacy, and children’s participation in social processes, but also the protection of children against sexual abuse. The Strategy for a Better Internet for Children will complement the EU Strategy on

the Rights of the Child and establish its digital dimension. Our vision is to have no child left behind, to shape an online world where children –regardless of their geographical, economic, and personal background – can use the Internet creatively and in a self-determined way, while at the same time being protected, empowered, and respected. The “European Declaration on Digital Rights and Principles for the Digital Decade” is now on the European Parliament’s and Council’s table and is expected to be jointly adopted later this year.

I look forward to continuing to work with you on realizing this vision.

**June Lowery-Kingston, Head of Unit Accessibility, Multilingualism & Safer Internet, and Deputy to the Director, Data, DG CONNECT, European Commission**

## Together for the Good of the Internet

### Dear Readers,

For us, 2021 was a milestone year, marking 25 years dedicated to combatting illegal content on the Internet. We accompanied this landmark year with a campaign under the motto of “Together for the Good of the Internet.” Together with our supporters Google, Facebook, Microsoft, and other network partners, we publicly spread the message that each and every individual can make their own contribution to responsible Internet use. We also highlighted the future challenges in the fight against illegal Internet content.

Our Trust & Safety Summit under the patronage of Dorothee Bär provided an exchange platform between politics and the Internet industry on current challenges in the prevention, take-down, and prosecution of illegal Internet content. I would like to take this opportunity to once again express my sincere thanks to the partici-

pants and supporters of the hybrid event and the three preparatory virtual pre-sessions.

Multiple webinars also allowed the eco Complaints Office to raise awareness among over 500 participants on responsible Internet use by children and young people and to shed light for them on legal issues. The exchange with multiple political actors generated an enormous resonance regarding our success in the fight against depictions of sexual abuse of children, as well as anti-constitutional and other prohibited content.

Our continued journey along this exchange path in 2022 is essential. Children and young people can grow up safely and age-appropriately online if the Internet industry – alongside self-regulatory authorities, policy-makers, and supervisory and law enforcement agencies – work together in close cooperation. This is also the case regarding the amendment of the

Protection of Minors in the Media, which, for us as a hotline, will most definitely continue to be on our radar this year.

A factor that our 2021 Annual Report unequivocally shows: Our society is increasingly sensitized to the fact that material harmful to children and young people or other illegal content must not be tolerated. Those who report such content actively contribute to its take-down and prosecution.

With 8,613 actionable cases, in 2021 we reached a new peak – amounting to a percentage increase of about 50 percent. Once again, depictions of sexualized violence against children made up the majority of these complaints.

The close cooperation with our national and international network partners also led to important

successes in 2021: In regard to German-hosted websites with content still referred to in German legal terminology as “Child Pornography” – i.e. depictions of the sexual abuse of children – 100 percent was taken down within an average of 2.65 days. Worldwide, such content was permanently removed in less than a week and with a success rate of around 98 percent. This underlines just how important the work of the hotlines is and that the principle of take-down instead of blocking continues to function extremely well.

At the same time, the evaluation of complaints about anti-constitutional content shows that not every needling comment meets the criteria for criminal prosecution. Many reports on hate and incitement on the Internet were ultimately subject to freedom of expression and were not further reported to law enforcement agencies or providers by the eco Complaints Office. As a society, we should continue

to stand united for the sake of peaceful coexistence and responsible Internet use to ensure that hatred and distrust have no place on the Internet.

In 2022, our anniversary motto is more relevant than ever: Together for the Good of the Internet. I look forward to further cooperation, 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](https://complaints-office.eco.de)) has been fighting illegal content on the Internet since 1996. It is embedded in the system of regulated self-regulation and has, in particular, the task of improving and promoting youth protection on the Internet.

Currently, eight staff members with a legal background work in the eco Complaints Office team. The team is composed of 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](https://complaints-office.eco.de) or [www.internet-beschwerdestelle.de/en/index.html](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](mailto:hotline@eco.de).

In addition, the eco Complaints Office is a partner of the information platform for young people, [jugend.support](https://jugend.support), and processes reports submitted there together with complaints offices (on an international level also known as hotlines) of the FSM and [jugendschutz.net](https://jugendschutz.net).

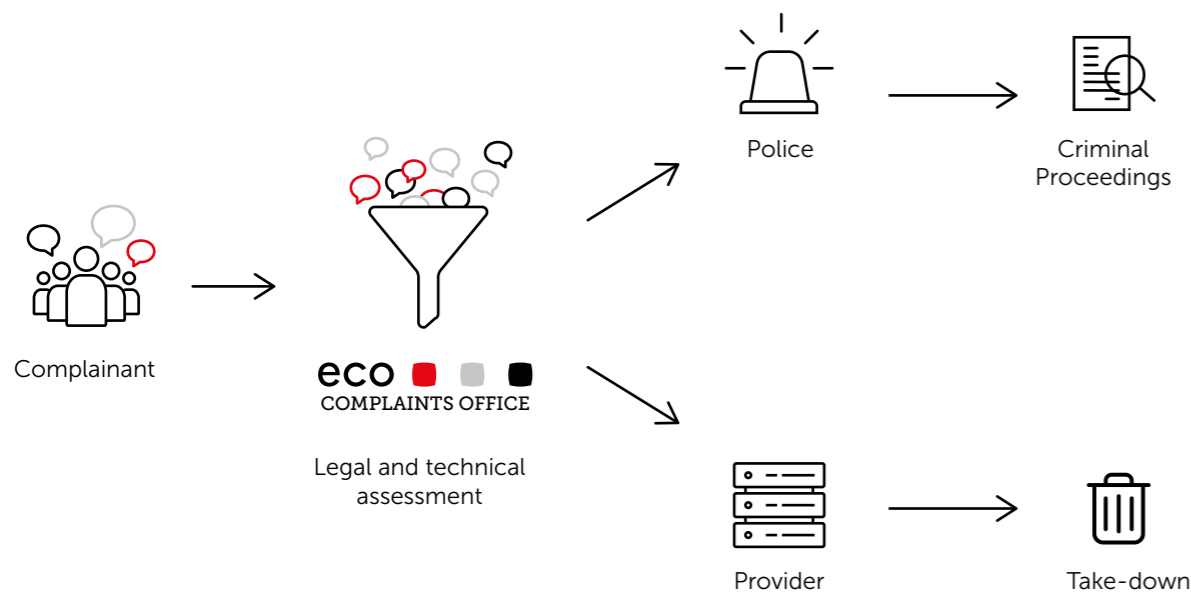
In order to effectively fight illegal online content, cooperation with other relevant players is essential. The eco Complaints Office therefore cooperates with, among others, providers, partner hotlines, and law enforcement agencies. eco is also a founding member of the International Association of Internet Hotlines (INHOPE), an international network that supports hotlines worldwide. 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 any Internet user. The provision of personal data is optional, which also allows the 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, 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 as well as the corresponding criminal regulations:
  - Section 184 et seq. German Criminal Code (StGB), freely accessible adult pornography, pornography depicting violence, animals, children, or juveniles
  - Section 86, 86a StGB, dissemination of symbols and propaganda material of unconstitutional organizations
  - Section 130 StGB, incitement of the masses
  - Section 130a StGB, attempting to cause the commission of offenses
  - Section 131 StGB, depictions of extreme violence
- Section 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.

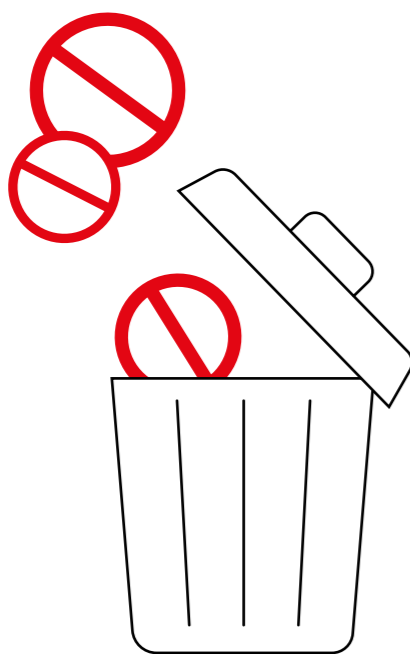
You can find further information and definitions of the various offenses at:

[go.eco.de/Legalbasis\\_ComplaintsOffice\\_2022](https://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 complete “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 beginning.

The Internet industry’s self-regulation mechanisms for the fight against unlawful online content work very well at both the national and international levels. In this regard, in the year under review, a good 97 percent of the content reported by the eco Complaints Office was removed – worldwide. A detailed presentation of the success rates and reaction times follows 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 content** hosted in Germany is always reported to the authorities. In addition, the Complaints Office asks that the hosting provider makes the relevant data available to the law enforcement agency on request and takes appropriate measures to prevent further access to the illegal content.

Should **absolutely prohibited Internet content** be hosted in Germany, the eco Complaints Office asks the hosting provider to take the content down (disconnect). For other **youth-endangering or developmentally**

**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 where the respective offense has no direct connection to Germany. However, in such cases, the offense must be something that has been committed against internationally protected legal interests; for example, in instances where Child Pornography content or violations of international law are the cases.

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.

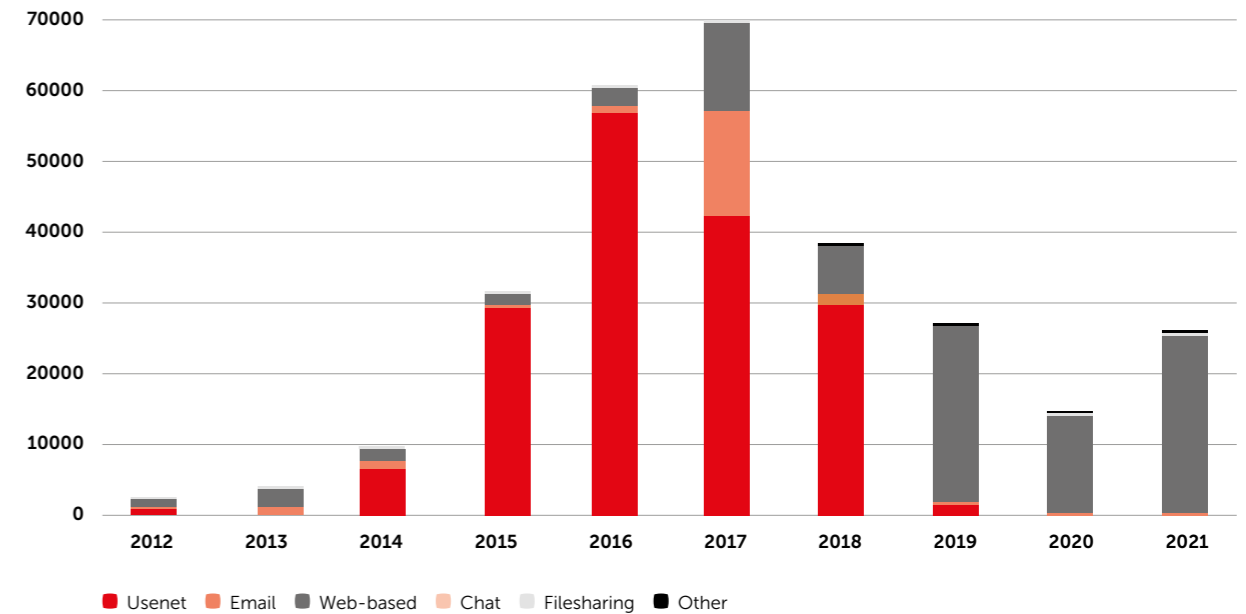


# 2. Complaints 2021: Facts and Figures

## 2.1 Number of complaints and measures taken in 2021 in the field of youth media protection

In the year under review, the eco Complaints Office received a total of 25,775 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, 2022

As in previous years, more than a half of the complaints received (17,758 cases) related to depictions of the sexual abuse and sexual exploitation of minors, in particular depictions that were legally classified as Child Pornography\* as defined in Section 184b of the Criminal Code. The number of reports on anti-constitutional content (356 cases) decreased compared to the previous year and is slightly above the level of 2016. On the other hand, reports on freely accessible adult pornography (6,156 cases) and so-called developmentally impairing content (219 cases) increased significantly compared to the previous year.

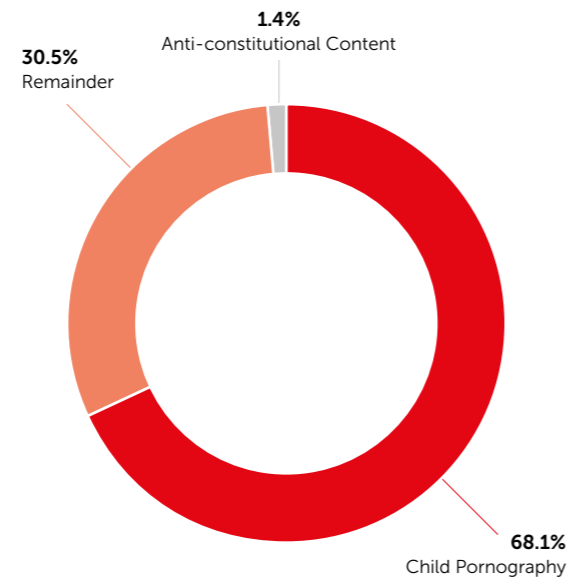
Approximately one third of the complaints received in the reporting year were actionable by the eco Complaints Office ("actionable complaints"). A complaint is considered as actionable if a violation of the law is detected, and measures are taken subsequent to an assessment. As a matter of principle, 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 (reporting to the police and

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

Compared to the previous year (2020: 5,523 actionable cases), the number of actionable complaints increased by 50.6 percent: With 8,613 cases, in 2021 the eco Complaints Office recorded a new peak in actionable complaints.

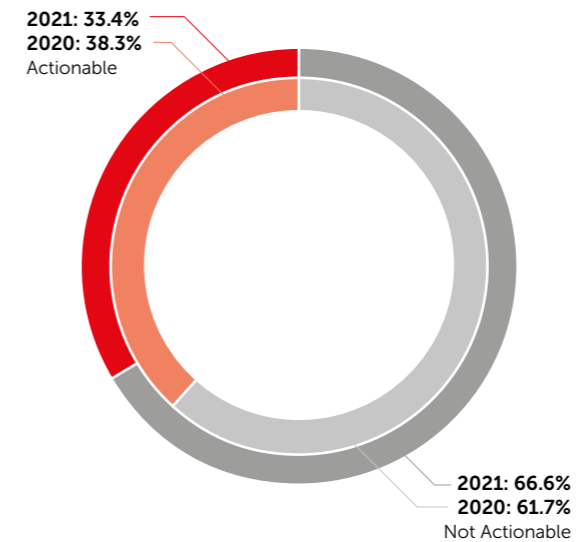
Received Complaints 2021 (Excluding Spam)



Source: eco Complaints Office, 2022

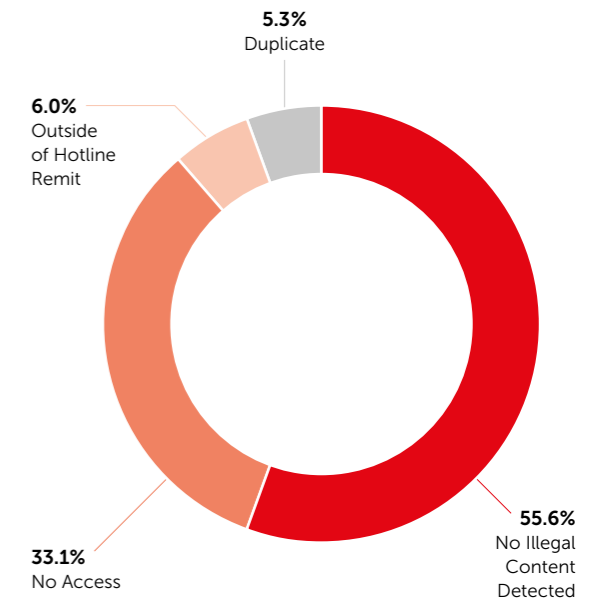
\* In the Annual Report, this "terminus technicus" of the legal text is used when referring to depictions of abuse of children as defined in Section 184b of the German Criminal Code (StGB). This is not intended as an explicit endorsement of the terminology, but serves solely to differentiate between 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.

Proportion of Actionable Complaints 2021 Compared to 2020 (Excluding Spam)



Source: eco Complaints Office, 2022

Not Actionable Complaints 2021 in Detail

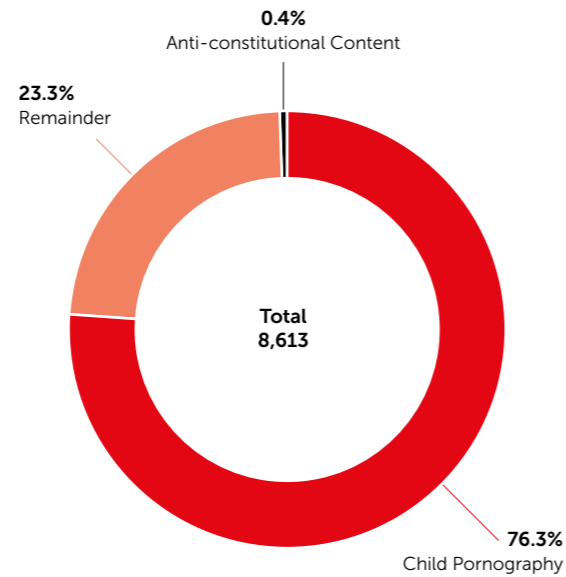


Source: eco Complaints Office, 2022

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

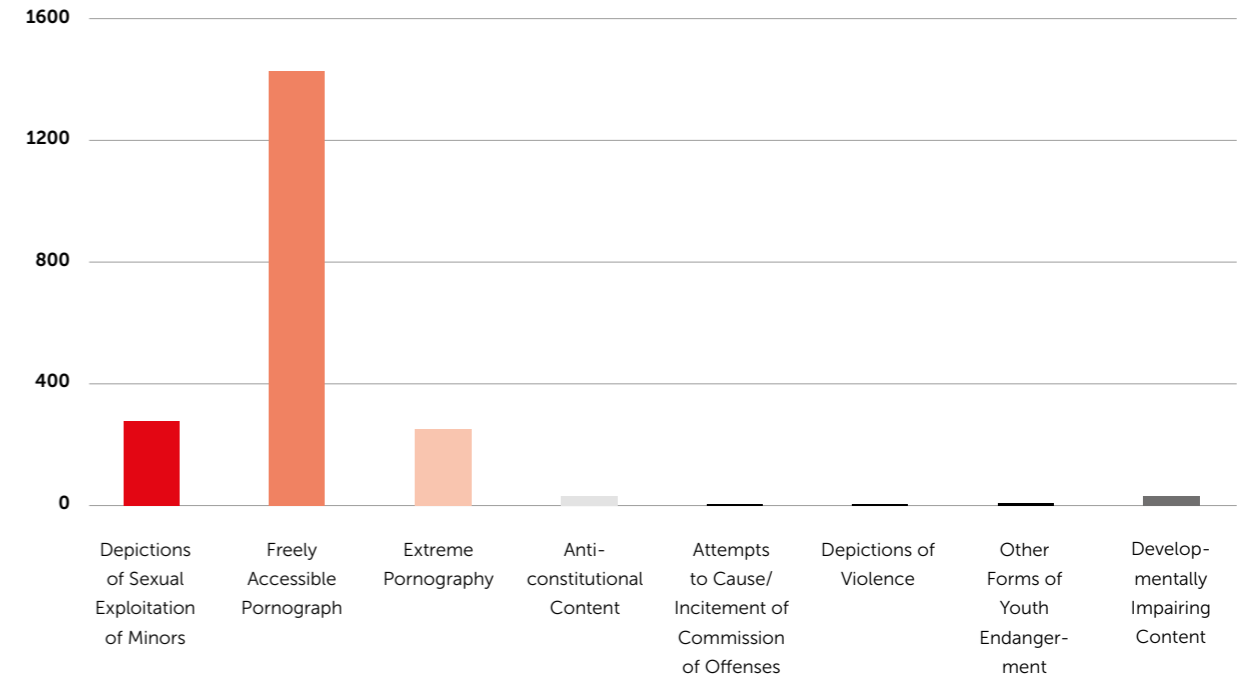
In terms of content, Child Pornography content also – as in previous years – accounted for the largest share of actionable complaints.

Actionable Complaints 2021 (Excluding Spam)



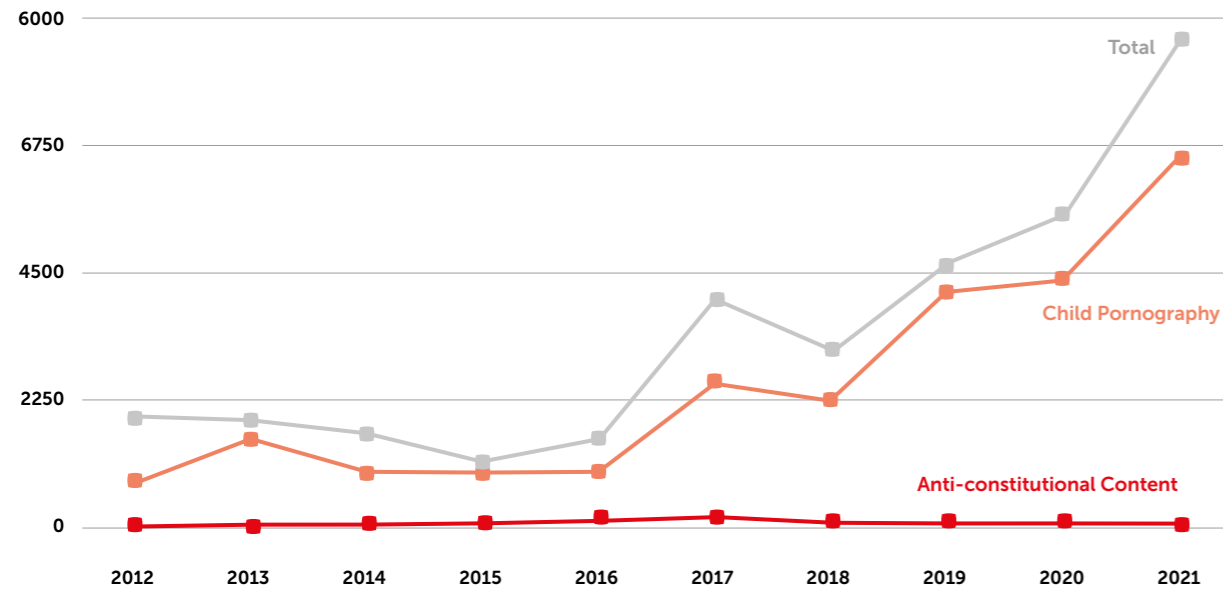
Source: eco Complaints Office, 2022

Actionable Complaints 2021 (Excluding Spam, Excluding Child Pornography)



Source: eco Complaints Office, 2022

Growth in Number of Actionable Complaints

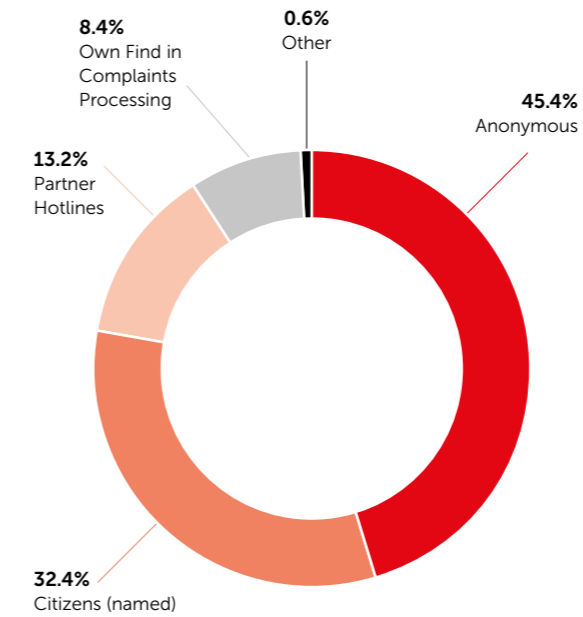


Source: eco Complaints Office, 2022

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

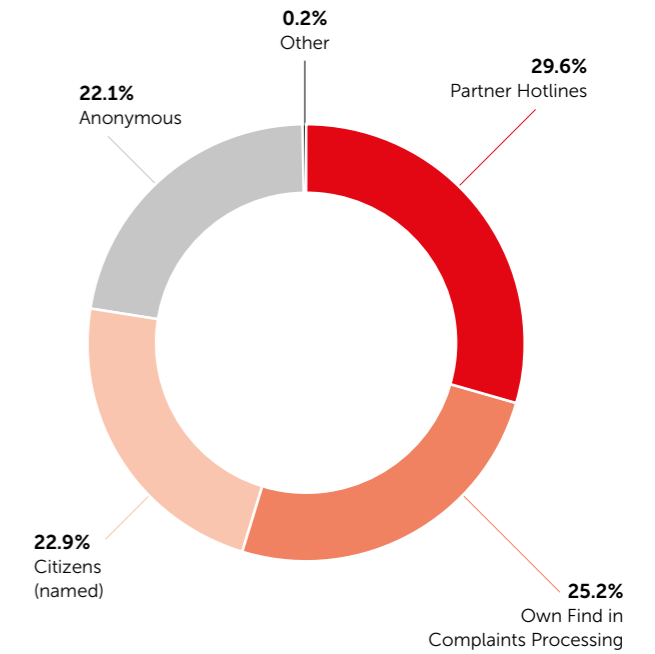
anonymous reports received increased by about 20 percentage points to 45.37 percent.

Reporters of the Received Complaints (2021)



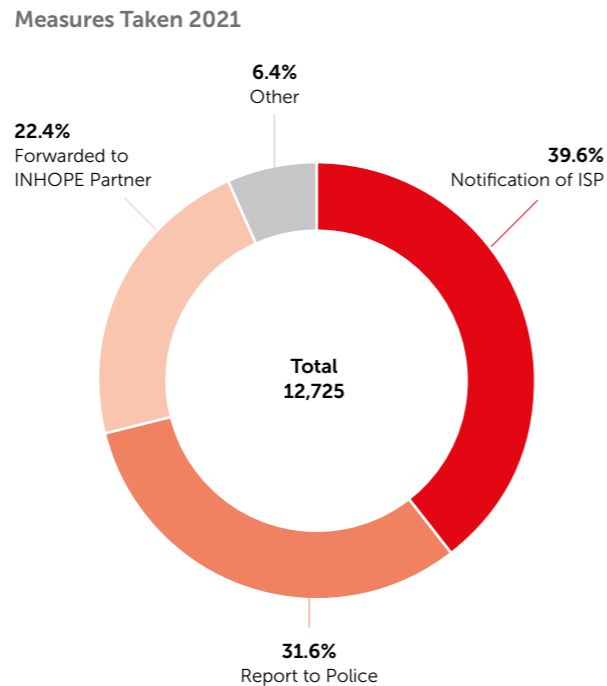
Source: eco Complaints Office, 2022

Reporters of the Actionable Complaints (2021)



Source: eco Complaints Office, 2022

Last year, the eco Complaints Office sent a total of 12,725 notifications (in particular to the police, INHOPE partner hotlines, and/or ISPs – not including reminders). In so doing, the relatively low proportion of reports sent to the police is due to the fact that, in cases of depictions of abuse of children on content hosted abroad, a report is generally only made to the German Federal Criminal Police Office (BKA) if no INHOPE partner hotline exists. If, on the other hand, an INHOPE member can be contacted who in turn informs the law enforcement agencies, reporting to the BKA is generally refrained from in order to avoid duplication of work.



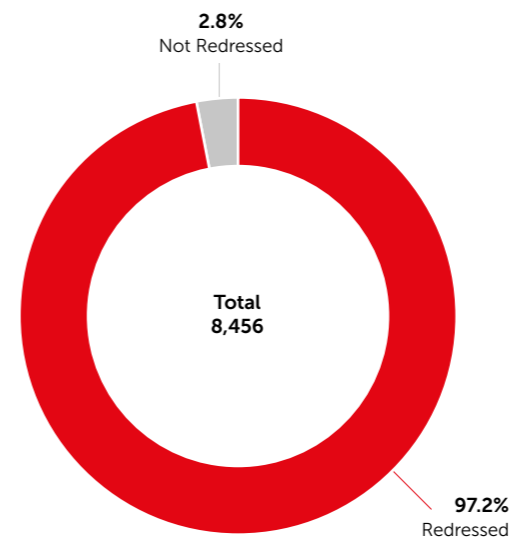
Source: eco Complaints Office, 2022

## 2.2 Success rate for web-based content

The high success rate for web-based content has remained constant when compared to the previous year: 97.15 percent of the content reported upon by the Complaints Office was taken down or otherwise

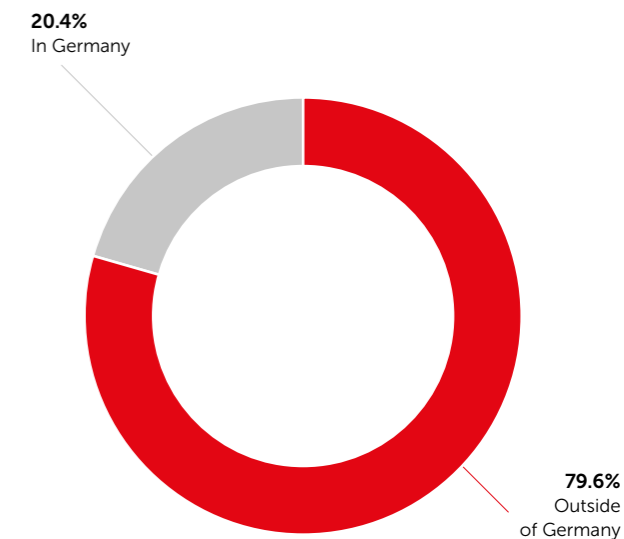
legalized (for example, through the implementation of an age verification system); in around 24 percent of these cases, the reported URL was initially moved to another provider (so-called “moved cases”).

Total Success Rate for Web-based Content 2021



Source: eco Complaints Office, 2022

Hosting of Web-based Content 2021



Source: eco Complaints Office, 2022

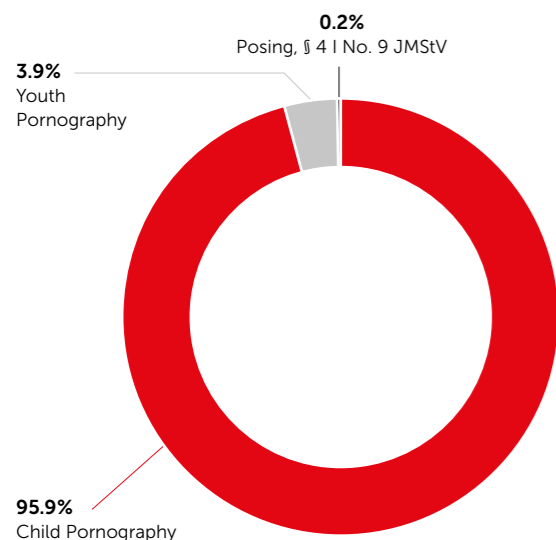
### 2.3 Complaints about depictions of the sexual abuse and sexual exploitation of minors (CSEM) in detail

The number of actionable complaints regarding depictions of the sexual abuse and sexual exploitation of minors increased by around 47 percent in 2021. Of the total of 6,851 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 abuse of children, images of partially or completely naked children in an unnatural or suggestive sexualized pose, and the sexually provocative reproduction of the naked buttocks or genitalia of children. 65.31 percent of actionable Child Pornography complaints in 2021 concerned the first variant (depictions of the sexual abuse of children). Compared to the preceding years, this is an increase of around 17 percentage points and thus roughly corresponds to the proportion from 2019.

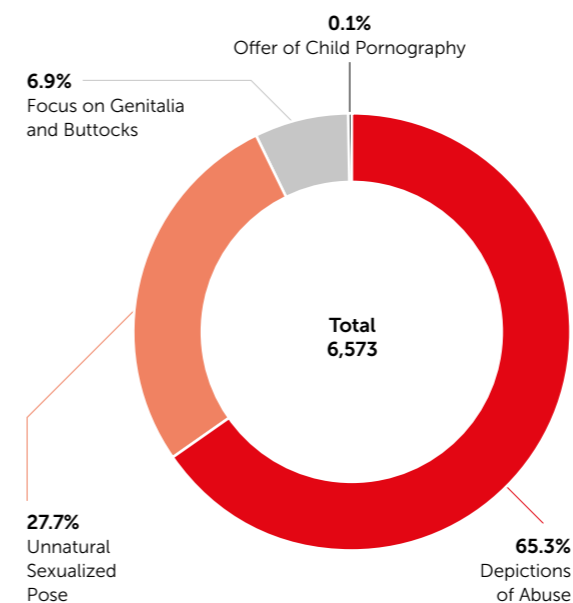
There was consequently a notable difference compared with previous years with regard to depictions whose focus was on the genitalia or buttocks.

Actionable Complaints of CSEM in Detail (2021)



Source: eco Complaints Office, 2022

Content Qualified as Child Pornography in Detail (2021)



Source: eco Complaints Office, 2022

In 2021, just under 30 percent of the actionable complaints in the area of depictions of the sexual abuse and sexual exploitation of minors concerned Posings, which constituted a slight increase of approximately 5 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 2021

As in previous years, in 2021 referrer cases and the use of Content Delivery Networks (CDNs) are particularly noteworthy from a technical viewpoint:

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

The involvement of Content Delivery Networks (CDNs) also makes it more difficult to process cases. 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 reminder (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.

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

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 abuse and sexual exploitation of minors. In addition to an assessment of the age of a child, particular examples to be mentioned here relate to the distinction between images of children in an unnatural sexualized pose and the sexually provocative reproduction of the unclothed genitalia or the naked buttocks of a child. A further challenge is presented by the different legal situations of countries; in particular, there are international

differences in the area of Posing, virtual or text-based Child Pornography, and cases of links to Child Pornography material.

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

At the beginning of the year, the eco Complaints Office received mass reports. The receipt of mass reports, i.e. the notification of a large number of URLs in one report, also poses a particular challenge. In the instance of a mass report, the otherwise usual distribution of received reports is not possible, as reported content must be reviewed and classified within the shortest possible time. This means that mass reports require considerable

human and technical resources, which means that other complaints received can only subsequently be processed.

In 2021, a proportionately large amount of content distributed via so-called file hosting services was reported. Viewing such content is 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 2021, in a few isolated cases, the eco Complaints Office also found that distributors of illegal content switched to hosting countries where there is not yet an INHOPE partner hotline, especially after take-down by the original provider. To some extent, this made it more difficult to make contact and submit requests for take-down.

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

It should be borne in mind when considering the following figures and graphs on reaction times for Child Pornography web content, as well as for Posing cases, that these do not necessarily represent the effective or actual reaction time of the Internet Service Provider (ISP). Instead, it represents the time from which the eco

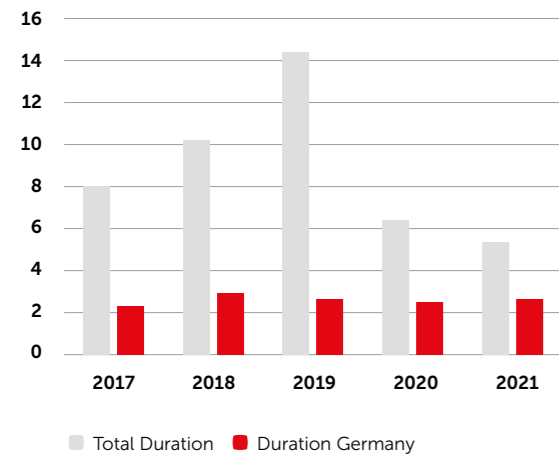
Complaints Office receives the report until it verifies the take-down. Here, the frequency of checks to ascertain take-down also influences the reaction times: the more often checks are made to see whether the content has been taken offline, the more exact and robust statements regarding reaction time are. The eco Complaints Office checks for take-down as a rule on weekdays, and does not remove weekends and public holidays on which it

does not work from the calculation of the accessibility and success rates.

In 2021, take-down times in Germany remained consistently short, and could once again be further shortened in cases outside of Germany: Websites with Child Pornography hosted in Germany were offline ("taken down") within 2.65 days on average, whereas globally it took 5.3 days.

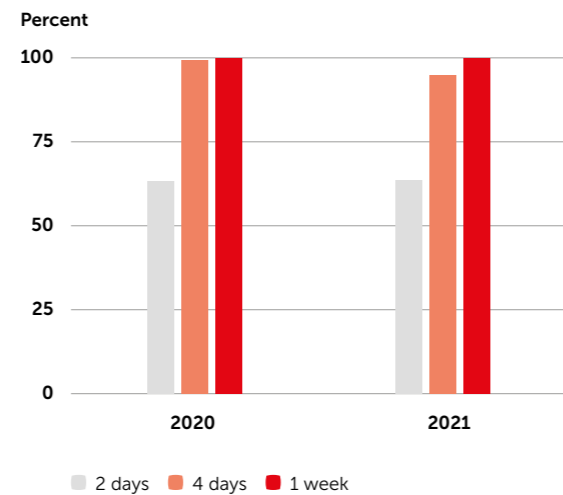
For Child Pornography content overall, a total success rate of 98.09 percent was recorded (for content hosted in Germany, this came to 100 percent). Overdue (as well as delayed) take-downs were primarily caused by different legal situations with regard to texts, virtual depictions, and links.

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



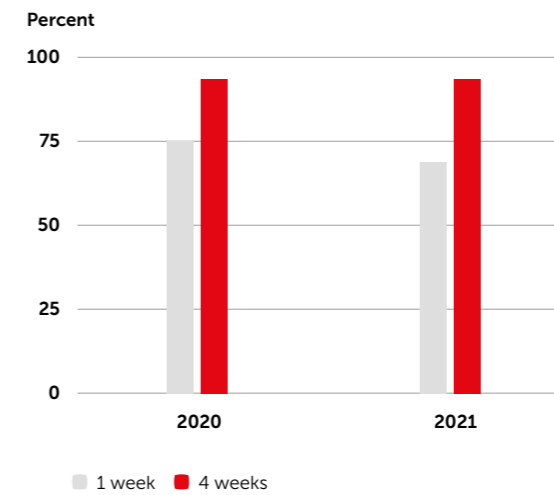
Source: eco Complaints Office, 2022

Take-Down Rates Child Pornography (German Cases)



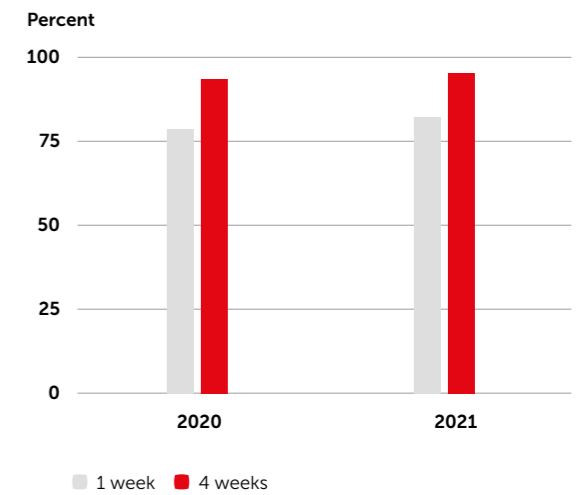
Source: eco Complaints Office, 2022

Take-Down Rates Child Pornography (Outside of Germany)



Source: eco Complaints Office, 2022

Take-Down Rates Child Pornography (All Cases)



Source: eco Complaints Office, 2022

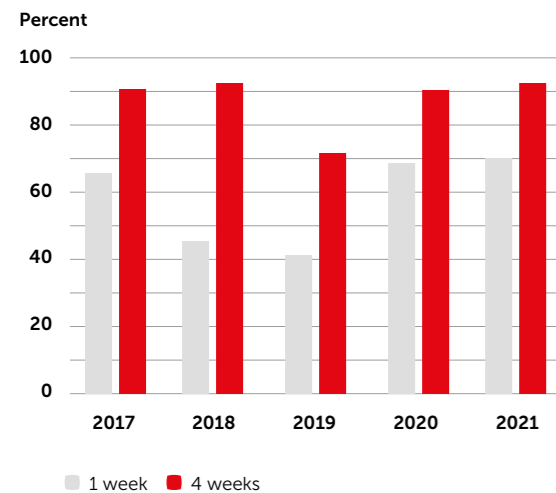


### 2.3.3 Overview of reaction times for web-based Posing cases

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 5.07 days from

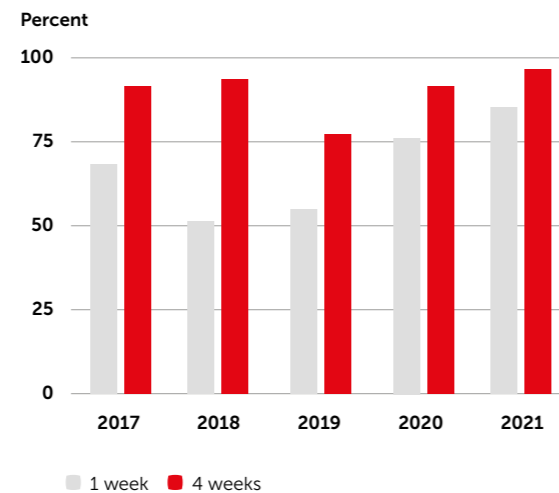
the report being submitted to eco until the content had disappeared from the Internet. Content hosted in Germany was no longer available on average after 2.18 days. (These figures also include public holidays and weekends.)

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



Source: eco Complaints Office, 2022

Take-Down Rates Depictions of Posing (All Cases)



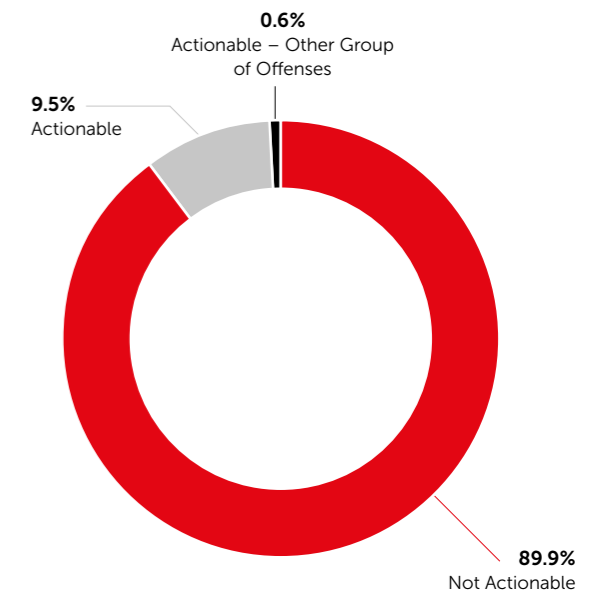
Source: eco Complaints Office, 2022

## 2.4 Complaints about anti-constitutional content in detail

The eco Complaints Office 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), and revilement of religious faiths (Section 166 StGB). In the final analysis, the eco Complaints Office classified 34 pieces of reported content as illegal in the area of "anti-constitutional content." This equates to 0.39 percent of all of 2021's actionable complaints. The relevant cases reported to us covered a broad range of services.

Around four-fifths of the actionable complaints concerning anti-constitutional content were attributed to the area of incitement of the masses. In addition to Holocaust denials, statements which were not uncommon were those allegedly made in the context of the ongoing pandemic situation. For example, aspects which were misused as opportunities and vehicles for the dissemination of criminally relevant statements included measures for combatting the pandemic, criticism of decisions at governmental level, and the promotion of vaccination.

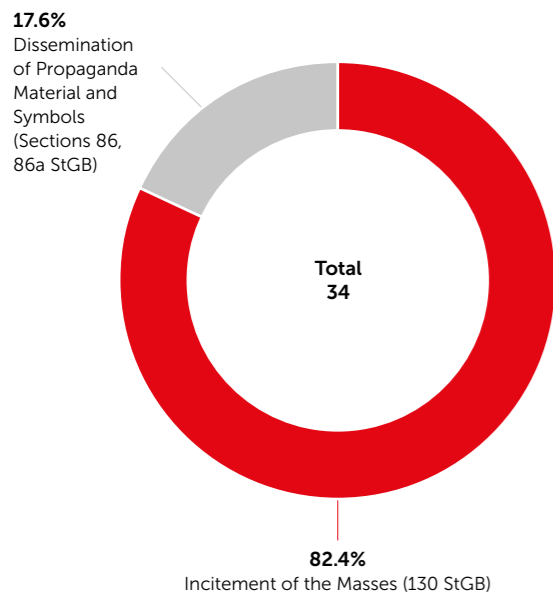
Proportion of Actionable Complaints on Anti-Constitutional Content 2021



Source: eco Complaints Office, 2022

In addition, the publication of unconstitutional symbols such as swastika flags and the dissemination of unconstitutional propaganda material were subject to complaint.

**Actionable Complaints on Anti-Constitutional Content in Detail 2021 (total)**

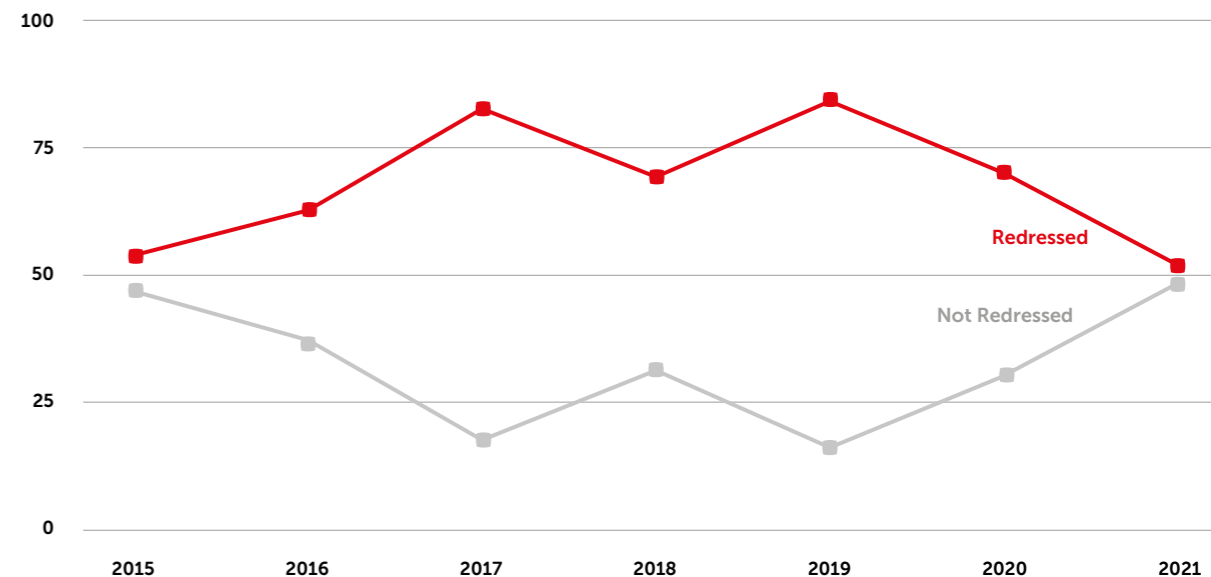


Source: eco Complaints Office, 2022

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 as undesirable.

Due to the low number of cases in 2021 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: In the year under review, a total of 51.52 percent of the anti-constitutional content reported by the Complaints Office was taken down. In this year, it took an average of 12.07 days (including weekends and public holidays) from the time the ISP was notified until this content was no longer available.

**Success Rates for Anti-Constitutional Content 2015–2021**



Source: eco Complaints Office, 2022

At this point, it should also be emphasized that only one case of reported content was hosted in Germany. In contrast to depictions of the sexual abuse of children, incitement of the masses and other anti-constitutional content is not equally prohibited around the world. In terms of their bases, 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 basis of prevailing law or the company's own T&Cs.

In addition, there were some cases in which the eco Complaints Office was asked by the law enforcement agencies not to notify the host provider for investigative tactical purposes. This also had an impact on the success rate in the year under review – especially in light of the low number of cases in the year.

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 depictions of the sexual abuse and sexual exploitation of minors are accorded priority, given that the possibility is always present of the law enforcement agencies identifying the victim or perpetrator, which means that further abuse can be prevented. At times when a high receipt of reports of depictions of sexual abuse and sexual exploitation of minors occurs, this can lead to delays in checking take-down times for other offense sectors, rather than these being checked at the usual frequency interval rate.

## 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.

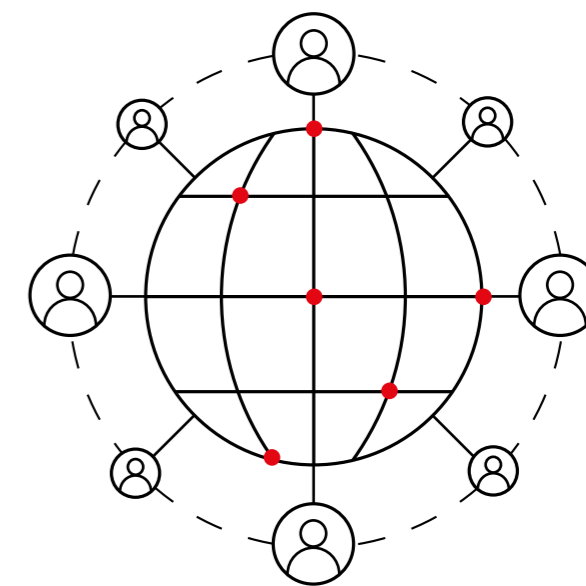
In the year under review, the eco Complaints Office received a total of 424,621 complaints concerning unsolicited advertising emails – equating to about 1.5 percent fewer than in the previous year. What should be highlighted is that the composition and advertised content of the relevant emails remained aligned to the pandemic situation. For example, significantly more advertising emails were sent out for respiratory protection masks. Furthermore, as was the case in previous years, there were also numerous repeated mailings.

## 3. Our Network

### Working together against illegal web content: National and international partner(ships)

The effective combatting of illegal internet content is a task for society as a whole and requires good cooperation 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 world-wide.

For this reason, the eco Complaints Office works at both the national and international levels together with a large number of parties, promotes cooperation, and engages in committees and initiatives. In this chapter, we introduce important partners in the fight against illegal Internet content and share an overview of our diverse network activities in 2021.



### 3.1 INHOPE ([www.inhope.org](http://www.inhope.org))

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

INHOPE is the international umbrella association of Internet hotlines which operate worldwide and accept complaints about illegal online content, with a particular focus on child sexual abuse material (CSAM). The network now consists of 50 hotlines in 46 countries. Complaints concerning illegal Internet content can thus be forwarded to the relevant responsible partner. In this way, the illegal content is investigated in its respective country of origin, which is also advantageous for criminal prosecution. If reported illegal online content is not located on a server in Germany, the eco Complaints Office informs the responsible INHOPE member in the particular case involved.

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

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

INHOPE itself is not a hotline, but supports the cooperation of the member hotlines in the individual countries. 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 terms of content, in 2021 the network placed a focus on the exchange of information on working approaches, technical developments to support complaint handling, and staff welfare. In addition, the implementation of the new European “CSAM Strategy” was an important topic of the network’s activities. The eco Complaints Office actively participated in this topic via its engagement in the INHOPE Policy Task Group. In addition, the INHOPE activities of the eco Complaints Office provided the opportunity for a virtual exchange with newly founded hotlines from Japan and Moldova. In this context, it was possible to exchange experiences and to present the best practices of the eco Complaints Office.

## INHOPE

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

INHOPE executive board and has held the role of Treasurer since July 2020.

### 3.2 Safer Internet Centre Deutschland ([saferinternet.de](http://saferinternet.de))



Reporting, advising, raising awareness – these are three important pillars for the positive online experience of young Internet users and for combatting illegal Internet content. For this reason, 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 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](http://www.internet-beschwerdestelle.de) 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. This initiative was continued last year as part of the German Safer Internet Centre.

As a partner of the German Safer Internet Centre, in 2021 the eco Complaints Office also held a joint workshop together with colleagues from FSM and “Nummer gegen Kummer” on the topic of “My Picture on the Wrong Screen – Shared Online, Felt Offline” at the international conference “Keeping Children and Young People Safe Online.”

In addition, the eco, FSM, and jugendschutz.net hotlines held a joint webinar on the occasion of the European Day on the Protection of Children against Sexual Exploitation and Sexual Abuse on 18 November 2021, and provided information on possible courses of action in cases of sexualized violence on the Internet.

In 2021, the German Safer Internet Centre was again 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, has been offering a protected surfing space for children for over ten years. This is based on a so-called whitelist for Internet sites suitable for children. This whitelist has been developed by fragFINN and is regularly checked by experienced media pedagogues. In the portal “fragFINN.de,” children are provided with, among other offers, a search engine which simplifies access for them to Internet sites which are designed to be safe for children.

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

## fragFINN.de

### 3.4 Network “No Sexualized Violence against Children on the Internet”

At the turn of the year 2020/2021, the German network “No Grey Areas on the Internet,” which was founded in 2014 against the abuse and sexual exploitation of children, transitioned to the working group “No Sexualized Violence against Children on the Internet.” The eco Complaints Office actively accompanied this further development process.

The three German hotlines form the core of the newly created working group, whose main activity in 2021 was the analysis and broad-based discussion of current developments in the field of “Sexualized Violence against Children on the Internet.” This was achieved not only by means of regular exchange meetings of the hotlines, but also through a virtual exchange among experts, which was organized and conducted by the working group on 30 November 2021. More than 60 experts from around 20 countries took part in this exchange.

The insights gained also served as a basis for the working group to start working on an advisory and information matrix for legal guardians, parents, and service providers.

In addition, the eco Complaints Office continued to comprehensively process complaints concerning depictions of the sexual exploitation of minors on the Internet, as well as their statistical recording and evaluation.

This work, alongside the extensive awareness-raising measures with regard to the sexual exploitation of minors, is supported by the German Federal Ministry for Family Affairs, Senior Citizens, Women, and Youth (BMFSFJ).

### 3.5 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 July 2021, once again showed that the principle of "take-down instead of blocking" and the cooperation of the hotlines, the BKA, and the Federal Review Board for Media Harmful to Minors (BPjM) (since mid-2021: the 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 to reflect the most current developments, most recently in 2017.

In the area of state security offenses, the eco Complaints Office cooperates with police authorities and public prosecutor offices at both the federal and state levels. Since 2019, eco has also been a member of the North Rhine-Westphalian initiative, "Prosecute, don't just delete," and thereby actively supports the rigorous criminal prosecution of hate speech on the Internet. In addition to a regular exchange on hate postings and their legal assessment, the initiative also enables a coordinated and optimized procedure for transferring criminal charges to the Central Bureau and Contact Office for Cybercrime North Rhine-Westphalia (ZAC NRW) of the Cologne Public Prosecutor's Office, which specializes in this area. The partners in the initiative came together in 2021 on the occasion of a working group meeting and in-depth legal training by ZAC NRW.

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

The eco Complaints Office is also active at the local level – one example is "SUSII" (Safe-and-Secure-on-the-Internet), a safety and security project that eco established together with the Cologne Police

Headquarters in 2016. SUSII (susii.nrw) is a free and non-commercial Internet safety and security portal, targeted initially at citizens (of Cologne), as well as at small and medium-sized enterprises (SMEs), and in the mean-

time 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).

### 3.6 Cooperation on youth media protection with other relevant actors

In 2021, the eco Complaints Office continued its exchange with other relevant actors in the field of youth media protection and further developed the existing network.

In the year under review, the amendment of the German Protection of Young Persons Act (JuSchG) was completed, which was supported by a continuous exchange of content between eco and the Federal Review Board for Media Harmful to Minors (BPjM) within the framework of what was called the Future Workshop. Developments that occurred on the basis of the revised JuSchG, which came into force on 1 May 2021, included the renaming of the Federal Review Board for Media Harmful to Minors (BPjM) to the "Federal Agency for the Protection of Children and Young People in the Media"

(BzKJ), and an expanded scope of the agency's tasks. In addition to indexing media harmful to minors, the statutory tasks now also include enhancing the further development of children and youth media protection. Furthermore, the agency reviews the compliance with the provider obligations newly stipulated in the law. This creates additional intervention points for further exchange between the eco Complaints Office and the BzKJ. Aside from that, the eco Complaints Office is now also a body authorized to file applications in the indexing field. For many years now, staff members of the eco Complaints Office have also been appointed as assessors of the review board.

The amended German Protection of Young Persons Act (JuSchG) was also an intervention point for further

exchanges between the eco Complaints Office and the Commission for the Protection of Minors in the Media (KJM). In addition, at the invitation of the KJM, the eco Complaints Office took part in a workshop discussion on the current developments in the area of technical youth media protection. Technical youth media protection is a core element of the federal states' deliberations on the amendment of the Interstate Treaty on the Protection of Minors in the Media (JMStV).

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

at the eco Complaints Office, has also been active in assessment committees as a youth protection expert for USK.online.

Furthermore, "trusted flagging/reporting" is an essential element of the eco Complaints Office's effective work. The special reporting channels for trustworthy whistleblowers enable direct interaction between hotlines and providers, which simultaneously has a positive effect on reaction times. Once again in 2021, cooperation in this area was further expanded and intensified. Five additional online providers have made special reporting channels available to the eco Complaints Office. In addition, the eco Complaints Office was appointed to Twitter's Trust and Safety Council for the area of "Child Sexual Exploitation" in the year under review.

### 3.7 Imparting media skills

Media education is a major challenge and responsibility. The adults responsible for this often come up against their own limits. Due to the fast-moving pace of the social networks and messenger services, 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, among other opportunities, for parents' evenings and teacher training courses, in order to sensitize people to legal risks and thus promote the positive use of all online services. In addition, the eco Complaints Office offers its own digital event formats.

In the year under review, the eco Complaints Office also actively supported the "Quality Alliance for Sport – Together against Sexualized Violence" of the Sports

Federation of North Rhine-Westphalia (LSB NRW). For example, the LSB NRW and the eco Complaints Office held a joint symposium entitled "Silence Protects the Wrong People" to raise awareness among parents, trainers, carers, and LSB NRW officials about sexualized violence against minors and to highlight possible courses of action.

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



## 4. Online Youth Protection for Companies

### Extra benefits for member companies

From the very outset, youth protection has been an important part of the eco Complaints Office's assessment standard. The eco Complaints Office was established on the initiative of our member companies in 1996 and can now look back on 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 not 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 protection.

#### ■ Network of experts and committee work

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

#### ■ Lasting offers for 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 who are active in the field of youth media protection, with the aims of exchanging experiences and gathering information. Two to three planned meetings are held per year, with additional relevant parties and external experts sometimes also invited to contribute.

Due to the Covid-19 pandemic, the expert lunch meetings were held virtually in 2021. Particular focal points of discussion included the amendment of the Protection of Minors in the Media (Youth Protection Act and the Interstate Treaty on the Protection of Minors in the Media), as well as changes in criminal law relating to sexualized violence against minors via digital media and in the area of hate speech. In addition, the (legislative) implementation of the European Commission's "Strategy for a More Effective Fight against Child Sexual Abuse" was an important agenda item. Furthermore, the eco Complaints Office experiences in combatting illegal

content and engaging in other political endeavors were also discussed.

The three meetings planned for 2022 are also expected to take place primarily on a virtual basis or in a hybrid format. In addition, teleconferences and online meetings will be offered on specific occasions when information or coordination is required in the short-term.

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

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

## eco Youth Protection Officer Service

The 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).



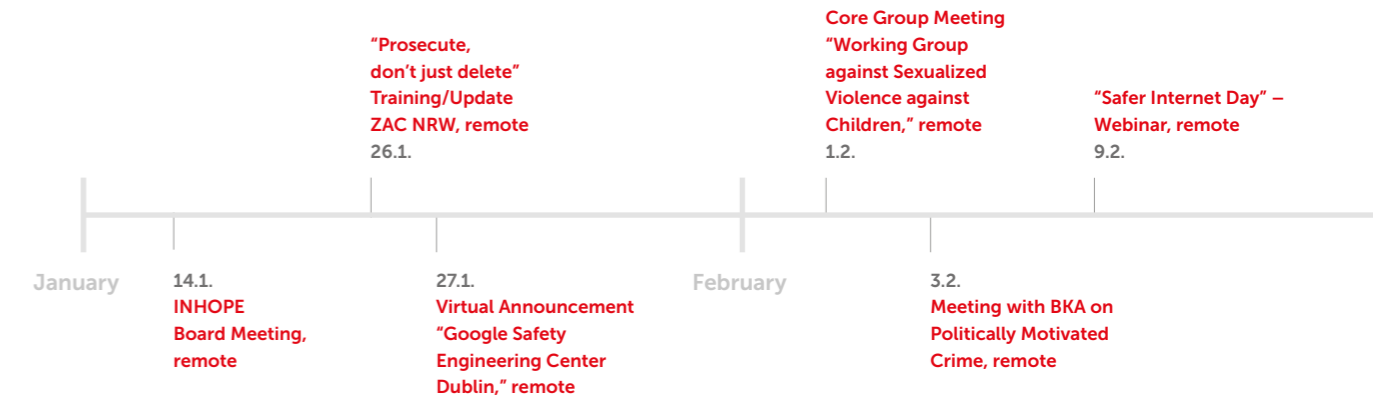
With the eco Youth Protection Officer Service, the Complaints Office provides comprehensive support to telemedia providers in fulfilling this obligation or in the voluntary appointment of a Youth Protection Officer. It offers the following functions and benefits:

- 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](mailto:jugendschutzbeauftragte@eco.de)

## 5. Events, Representation, and Political Work



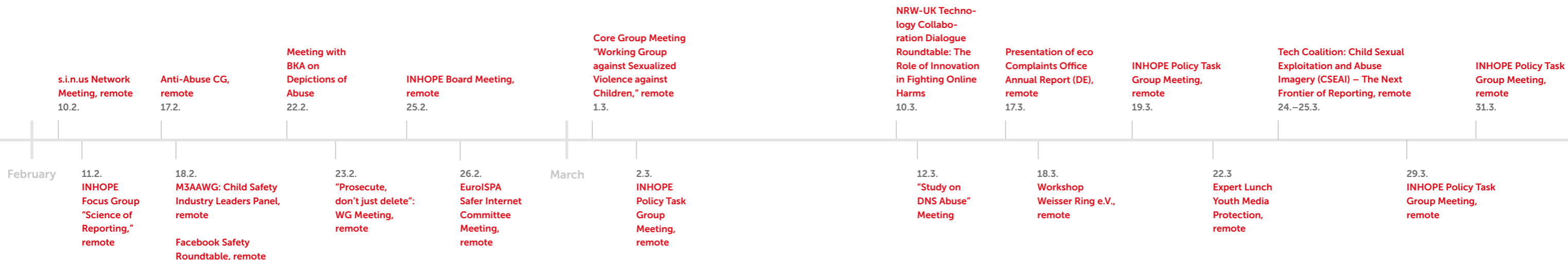
In its fight against illegal Internet content, in 2021 the eco Complaints Office continued its active involvement in numerous events and committees at national and international level. The following chapter features a sample of these activities.

9.02.2021

### Safer Internet Day 2021

As in previous years, the eco Complaints Office held a joint event with the Cologne Police Headquarters to mark Safer Internet Day. Due to the pandemic situation, a digital workshop was organized by consultants from the eco Complaints Office, as well as a representative of the Criminal Commissioner's Office for Crime and Victim Protection, with the title of the workshop being *"Fake and the possible consequences of an error – Use social networks safely, rather than getting caught on the wrong hook."*

The 350 or so participants mainly included teachers, social educators, and staff members of state institutions. The eco Complaints Office and the Cologne Police Headquarters provided practical and interactive information about developments and possible risks in the areas of sexualized violence and anti-constitutional content in the digital space.



**18.02.2021, 12.10.2021**

**M3AAWG panel participation**

In 2021, the eco Complaints Office was represented by Consultant Peter-Paul Urlaub in contributing to two M3AAWG information and discussion events, both of which were moderated by Sarah Neiswonger (GoDaddy, M3AAWG).

In the course of the "Child Safety Panel," Toby Dagg (Executive Manager – Investigations at eSafety Commissioner), Denton Howard (INHOPE), Cathal Delaney (Europol), Kenneth Villa (Tech Coalition), and Peter-Paul Urlaub talked through current topics concerning combatting depictions of abuse on the Internet. The impact of Covid-19 on the processing of complaints was initially discussed. This was followed by talks on technical topics such as Safety by Design as well as end-to-end encryption in connection with the so-called

Interim Derogation, which in Europe allows providers to voluntarily search for misrepresentations. In addition, a talk took place on improved cooperation opportunities.

In the second panel, "Secondary Trauma in Anti-Abuse Work Panel," Michael Munion (Arizona Behavioral Consulting), Lanae J. Holmes (National Center for Missing & Exploited Children), and Peter-Paul Urlaub discussed the risks faced by anti-abuse team members: In order to remove unlawful content from the Internet, staff/team members must first view the content and confirm that it is unlawful. As a result, they also see footage of depictions of abuse of children, extreme violence, and other criminal offenses. This can lead to what is called secondary trauma.

Possible solutions that were also discussed in the panel included, for example, regular visits to traumatologists

or general psychological support/supervision when working with stressful content. Furthermore, various mechanisms were discussed that can be taken to protect employees in the moment when they are viewing the content or shortly thereafter, such as the separation of sound and image, the use of technical means such as black-and-white or blur filters, and the targeted use of recess periods.

**26.02.2021, 14.04.2021, 10.09.2021, 26.11.2021**

**EuroISPA Safer Internet Committee**

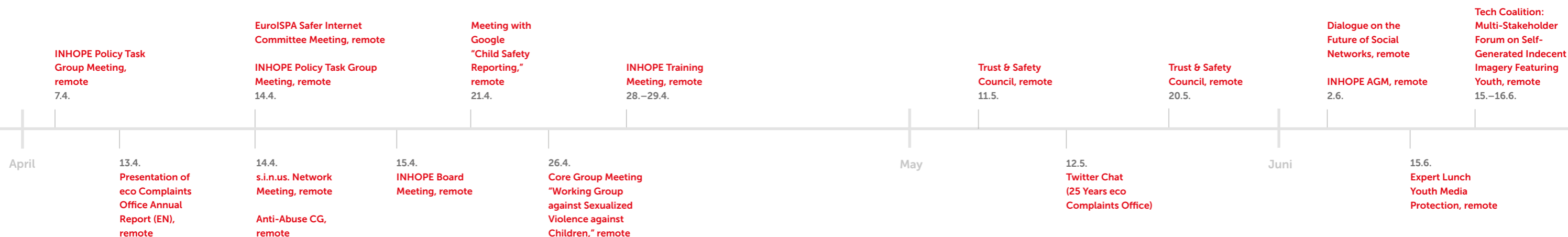
Through its participation in virtual meetings of the EuroISPA Safer Internet Committee, the eco Complaints Office – represented by Alexandra Koch-Skiba, Head of the Complaints Office – was able to actively accompany political and regulatory developments on the fight against prohibited Internet and youth-endangering

content on a European level. In doing so, the eco Complaints Office also shared its own experiences in combatting such content with the other EuroISPA members. Plans of the European Commission for a new legal framework in the area of "depictions of abuse" formed a focal point of the content.

**10.03.2021**

**NRW-UK Technology collaboration dialogue roundtable: The Role of Innovation in Fighting Online Harms**

In a roundtable dialogue involving the British Consulate General in Dusseldorf, the Minister of Justice of North Rhine-Westphalia, and further representatives of the state, industry, civil society, and law enforcement agencies, the eco Complaints Office had an opportunity to discuss the status of youth media protection and how to combat threats such as disinformation. The panel looked



at this from the specific perspective of British and North Rhine-Westphalian institutions and explored possible collaborations. The focus was on all-round use of technical solutions within the respective legal frameworks, with the aim of making the Internet safer for all users.

12.03.2021

#### Study on DNS Abuse

The Institut Polytechnique de Grenoble has prepared a study for the European Commission (DG Connect – Unit of Next-Generation Internet) on the topic of "Domain Name System (DNS) Abuse." In this context, a workshop took place in 2021 in which the eco Complaints Office was able to present its approach and its measures as well as the corresponding statistics and successes. The workshop was attended by various registrars and registries, resulting in further discussions with the eco Complaints

Office on combatting illegal content – in particular with regard to depictions of abuse of children.

17.03.2021, 13.04.2021

#### Presentation of the eco Complaints Office's 2020 Annual Report

In the presence of State Secretary Prof. Christian Kastrop (Federal Ministry of Justice and Consumer Protection (BMJV)), the Head of the eco Complaints Office Alexandra Koch-Skiba presented the 2020 Annual Report in German and English on 17 March and 13 April 2021 respectively. These presentations took place via a virtual press and policy briefing.

With 5,523 cases, the eco Complaints Office had once again registered a record number of actionable complaints. Once more, a large proportion of these in 2020

involved depictions of sexual abuse and sexual exploitation of minors.

The 2020 report once again highlighted that, despite a substantial number of complaints, the principle of take-down instead of blocking works and yields success. For example, the eco Complaints Office was able to effectively take action against prohibited content in 97.7 percent of cases worldwide, thus maintaining the good success rate from previous years.

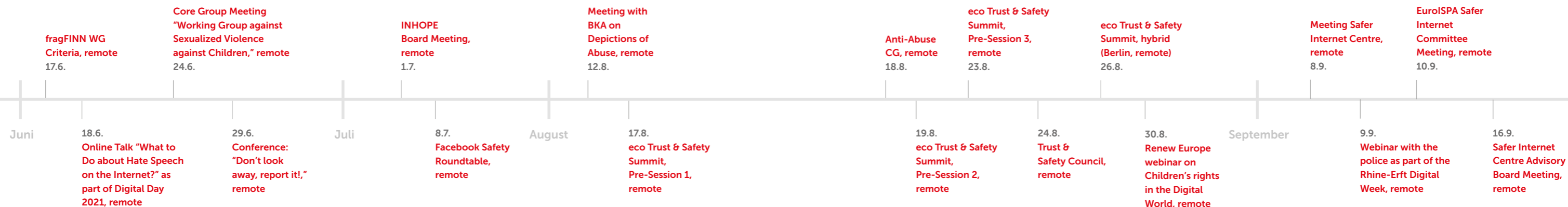
The two webinars marked the official launch of the eco Complaints Office's activities in its anniversary year.

24./25.03.2021, 15./16.06.2021

#### Tech Coalition

The eco Complaints Office, represented by Peter-Paul Urlaub, participated in two event formats of the Tech Coalition in 2021.

In the webinar "Child Sexual Exploitation and Abuse Imagery (CSEAI): The Next Frontier of Reporting," the initial discussion focused on the EU's plans for a so-called European Center to coordinate and support the fight against sexual violence against minors in Europe. This was followed by presentations by eco, INHOPE, and NCMEC on the processing of complaints on depictions of abuse and the associated steps required from different perspectives. The eco Complaints Office was therefore in a position to share information about its processes and achievements. In addition, the perspectives of law enforcement agencies and the industry were presented



and strengths and weaknesses were discussed, alongside possible solutions.

The multi-stakeholder forum in June covered the topic of "Self-Generated Indecent Imagery Featuring Youth" and dealt in depth with the phenomenon of young people creating sexualized images or videos of themselves and afterwards sharing them with others. In addition, possible consequences of this action were examined. It became clear that, while in many countries self-created sexualized depictions of young people are prohibited, law enforcement often focuses on the illegal distribution of such images (for example, by third parties) rather than on the creation of the images themselves.

In addition, the forum worked on the formulation of a definition of self-generated content.

02.06.2021

#### Dialogue on the Future of Social Networks

In 2021, the eco Complaints Office once again took part in the "Dialogue on the Future of Social Networks" of the German Federal Ministry of Justice and Consumer Protection (BMJV). This event series involves a systematic exchange of views on the topic of hate crime on the Internet between ministry representatives, law enforcement agencies, the industry, and civil society, among others. The fourth meeting focused in particular on topics relating to the Digital Services Act.

18.06.2021

#### Online Talk "What to Do about Hate Speech on the Internet?" – Digital Day 2021

As part of Digital Day 2021, the German Cultural Council ([www.kulturrat.de](http://www.kulturrat.de)) organized an online talk on the topic

of hate speech on the Internet. The talk was moderated by Barbara Haack, with the speakers including Olaf Zimmermann from the Cultural Council, Sina Laubenstein from the "Neue deutsche Medienmacher:innen," Lutz Mache from Google, and the Head of the eco Complaints Office Alexandra Koch-Skiba. The various speakers discussed existing possibilities for action and legislative plans in this field. For the eco Complaints Office, this offered the opportunity to not only share eco's practical experience, but also to contribute eco's assessment of the German Network Enforcement Act (NetzDG) and its amendments.

21./22.09.2021

#### INHOPE Summit

INHOPE held its annual Summit on 21 and 22 September 2021 under the title of "Digital First Responders." Digital first responders are analysts and anti-abuse team members who, like firefighters and other rescue units, are the first to react and take appropriate action – in this case against illegal Internet content.

Consultant Peter-Paul Urlaub illustrated how the eco Complaints Office processes reports of abuse, what successes it has already achieved in taking them down, and what factors play a role in this work.

The summit also examined the well-being and safety of staff members and how technology can support these members.



23.09.2021

### NamesCon Panel "The Future of Domain Name Registration Data"

Over the course of NamesCon 2021, Sebastian Fitting, Consultant at the eco Complaints Office, took part in a panel on "The Future of Domain Registration Data," with the content that he presented including the work of the Complaints Office. A particular topic that the panel explored was the impact of the GDPR on Whois data, i.e. information on the registrant and hoster of a website, from the perspectives of law enforcement agencies, hotlines, and domain registrars or registries. From the discussion, it emerged that the removal of domain registration data from the public domain has so far had little to no impact on the work of these parties.

30.09.2021

### KJM Workshop Discussion on (Technical) Protection of Minors in the Media

At the invitation of the Commission for the Protection of Minors in the Media (KJM), on 30 September 2021 the eco Complaints Office took part in Berlin in the third workshop discussion, which was organized by the KJM and the State Chancellery of Rhineland-Palatinate in cooperation with the Federal Agency for the Protection of Children and Young People in the Media. Representatives of industry associations, self-regulatory bodies, media institutions, and broadcasting experts came together to discuss current developments in the technical protection of minors in the media.

The upcoming amendment to the State Interstate Treaty on the Protection of Minors in the Media (JMStV) was

also a core topic. The planned changes were outlined by the state chancelleries of Bavaria and Saxony and then extensively discussed with the participants.

06.10.2021

### i2 Coalition Speaker Series – Addressing Harmful Content

The experiences and best practices of the eco Complaints Office were also shared internationally as part of the so-called Speaker Series of the i2 Coalition (www.i2coalition.com). In a webinar which took place on 6 October 2021, the Head of the Complaints Office Alexandra Koch-Skiba, Lindsey Olson from the American Partner hotline NCMEC, and Dan Sexton from the British partner hotline IWF reported on their respective working approaches and associated achievements in combatting

depictions of abuse. Tom Thorley from the Global Internet Forum to Counter Terrorism (gifct) also spoke about the experiences gathered by the forum.

06./07.10.2021

### Safer Internet Forum

The Safer Internet Forum 2021 took place under the motto of "Shaping a #DigitalDecade4YOUth" and was held as a complete virtual conference. In addition to the exchange with international actors from the field of youth media protection, a specific focus was applied to the European Commission's "Digital Strategy." In particular, the eco Complaints Office was represented in the deep dive sessions of "Child Sexual Abuse Material (CSAM)" and "Harmful Online Content, Experiences, and Solutions."



**07.10.2021**  
**Conference on "Protecting Freedom, Securing the Law Together"**  
 Christian Kubiak, Consultant at the eco Complaints Office, took part in the conference "Protecting Freedom, Securing the Law Together" of the State Media Authority of North Rhine-Westphalia on 7 October 2021 in Düsseldorf. In addition to keynote speeches by representatives from politics and state supervisory authorities, the participants – colleagues from the areas of law enforcement, supervision, hotlines, and other media professionals – had the opportunity to address individual issues in small group workshops. The eco Complaints Office contributed to the workshop on youth media protection, reported on its experience in imparting (youth) media skills, and delivered a presentation on existing protection measures in the Internet industry. In further workshops, topics that were addressed included the challenges of

disinformation, digital supervision, and media skills for specific target groups.

**17./18.11.2021**  
**BKA Autumn Conference**  
 At the invitation of the German Federal Criminal Police Office (BKA), the eco Complaints Office participated in the BKA Autumn Conference in November 2021. The 66th iteration of the event was entitled "Stability instead of Divisiveness: What Does Internal Security Uphold and Manage?" The conference focused in particular on the description and the causes of social division and polarization, as well as their impact in various fields of crime. In this respect, different approaches to societal solutions were discussed.

**22.11.2021**  
**Virtual Meet & Greet with "topDNS" Initiative**  
 A virtual Meet & Greet between the new eco "topDNS" initiative and the eco Complaints Office took place on 22 November 2021. During this meet-up, the eco Complaints Office reported to the registries and registrars participating in the initiative, not only on its working approaches and track record, but also about existing challenges encountered in some cases. An additional aspect of the discussion concerned not only the extent to which registrars and registries can serve as an escalation channel in taking down depictions of abuse of minors, but also under which limited conditions this can take place.

**04.12.2021**  
**Online Symposium Sports Federation NRW**  
 With the support of the eco Complaints Office, the Quality Alliance for Sport NRW of the Sports Federation of North Rhine-Westphalia (LSB NRW) held an online symposium entitled "Silence Protects the Wrong People – Dealing with Cyber Incidents" on 4 December 2021. Christian Kubiak, Consultant at the eco Complaints Office, informed approximately 60 participants from boards and committees of affiliated sports clubs and associations about trends of illegal Internet content. In an interactive workshop, the participants were also trained on the topic of sexualized depictions of minors.



## 6. Public Relations Work

The high degree of commitment that the eco Complaints Office offers to child and youth protection and to combatting prohibited content online was demonstrated in manifold forms in 2021. On the occasion of its 25th anniversary, the eco Complaints Office launched the campaign "Together for the Good of the Internet." With this campaign, it successfully presented its working approaches and achievements to politicians, the press, and the public through all of the eco Association communication channels.

### **Anniversary year campaign: Together for the Good of the Internet**

At the heart of the campaign was the "eco Trust & Safety Summit": a hybrid event format that took place on 26 August in the Kronprinzenpalais (the Crown Prince's Palace) in Berlin under the patronage of Dorothee Bär – who at that time was the German Minister of State for Digitalization in the Federal Chancellery. Other campaign elements included a three-part video clip with information on reporting options, working approaches, and cooperation options of the eco Complaints Office, as well as the Twitter chat "#FürsGuteImNetz" ("For the Good of the Internet"). The Twitter chat generated an enormous coverage of more than 66,000 impressions under the umbrella of the Complaints Office's network. In an episode of the eco podcast "Das Ohr am Netz" ("The Ear to the Internet"), the Head of the eco Complaints Office Alexandra Koch-Skiba also provided information on how Internet users can report content that is illegal or youth-endangering. All campaign elements were also

featured on a landing page devised for the anniversary. Here, the eco Complaints Office also published selected congratulations from national and international network partners as well as political actors. These included congratulatory statements from Renate Künast, Member of the German Bundestag, Alliance 90/The Greens, and Lars Klingbeil, Member of the German Bundestag and Federal Chair of the SPD since December 2021.

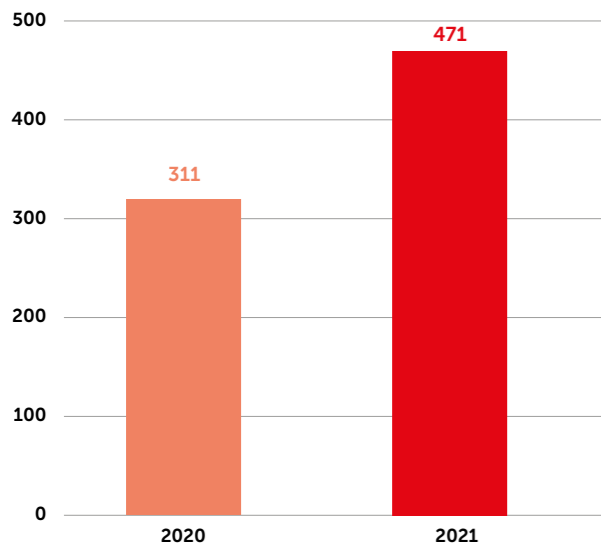
### **51 percent increase in media coverage**

In its anniversary year, the eco Complaints Office received strong media coverage. Spiegel Netzwelt, Tagespiegel Background, and Computer BILD, among others, reported on the record high that the eco Complaints Office had registered for notified legal violations in 2020. Prior to this, the eco Complaints Office had presented its annual report together with Prof. Christian Kastrop, the then State Secretary in the German Federal Ministry of Justice and Consumer Protection (BMJV), at both national and international level.

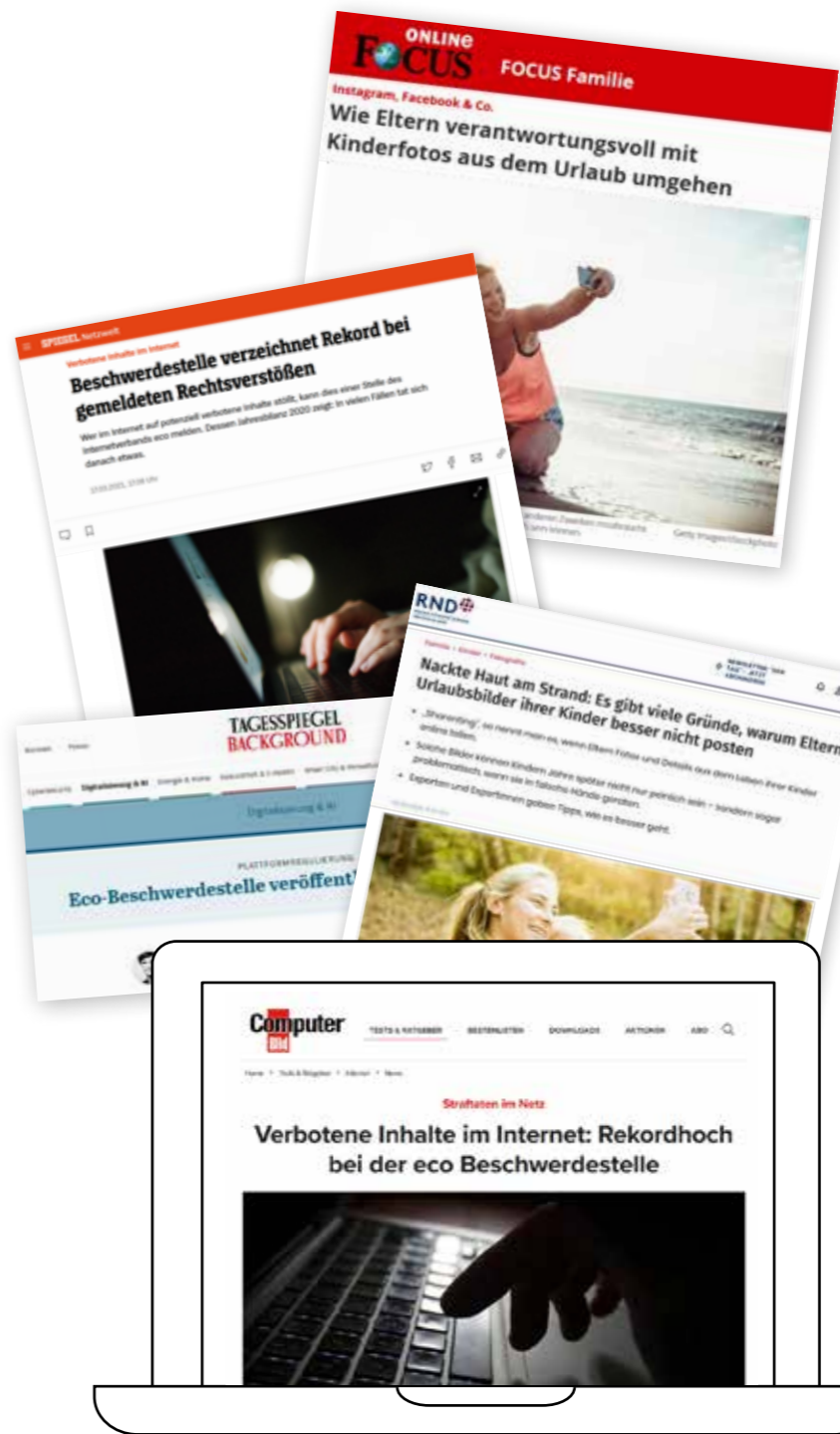
At the start of the vacation season, the Head of the Complaints Office Alexandra Koch-Skiba also received a great deal of media coverage on the tips that she offered to parents on what they should look out for when posting and sending photos of children. The topic was picked up by both national and regional media, including RTL Punkt 12, ZDF, Focus Online, and Redaktionsnetzwerk Deutschland. Overall, the eco Complaints Office experienced a 51 percent increase in its media coverage in comparison to the previous year.

## eco Complaints Office media evaluation

+ 51 percent Compared to the Previous Year



## Topic highlights



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

The eco Complaints Office celebrated its 25th anniversary as part of the “Together for the Good of the Internet” campaign. The following chapter portrays several of its highlights.



## Infoclip: Report illegal content!

Together for the Good of the Internet – this is how the eco Complaints Office works

February

## Anniversary website

All campaign content gathered on a dedicated landing page:  
[international.eco.de/25-years-eco-complaints-office/](https://international.eco.de/25-years-eco-complaints-office/)



March

## National presentation of the eco 2020 Annual Report

Online DACH presentation on 17 March 2021.  
Keynote Christian Kastrop, State Secretary BMJV.





### Twitter Chat #FürsGuteImNetz (#For the Good of the Internet)

Under the umbrella of the Complaints Office's network, more than 66,000 Twitter impressions were generated.

April

May

June

### International presentation of the eco 2020 Annual Report

Online presentation on 13 April 2021. Keynote Christian Kastrop, State Secretary BMJV.



### eco podcast

In the eco podcast "Das Ohr am Netz" ("The Ear to the Internet"), Head of the eco Complaints Office Alexandra Koch-Skiba provided information to Internet users on how they can report content that is illegal or youth-endangering.

[https://www.eco.de/news/podcast\\_eco\\_beschwerdestelle/](https://www.eco.de/news/podcast_eco_beschwerdestelle/)

July

### Safely post photos of children

Head of eco Complaints Office Alexandra Koch-Skiba gives five tips on what parents should watch out for when posting and sending photos of children.



### Pre-summit sessions

National and international pre-summit sessions with the participation of important network partners – including Twitter, Instagram, the Central Bureau and Contact Office for Cybercrime North Rhine-Westphalia (ZAC NRW), T3K-FORENSICS, the Entertainment Software Self-Regulation Body (USK), and the State Media Authority of North Rhine-Westphalia – on the topics of compliance, prevention, and legal enforcement, as well as the use of new technologies in the fight against illegal Internet content.

August



### eco Trust & Safety Summit

Together for the Good of the Internet:  
Hybrid Event on 26 August in Berlin.



Under the patronage of Dorothee Bär, former Minister of State for Digitalization in the Federal Chancellery, and with additional impetus from Prof. Christian Kastrop, former State Secretary in the Federal Ministry of Justice and Consumer Protection (BMJV).



Panel Talk: Together for the Good of the Internet (ltr: Felix Reda, Renate Künast, Alexa von Busse, Eveline Metzen, Kai Michael Hermsen, Sebastian Gutknecht)

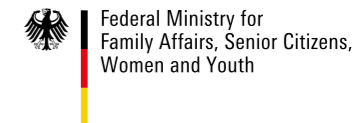
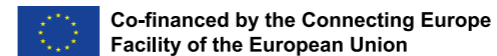
## What can you do?

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](https://complaints-office.eco.de)



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## Legal Notice

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