Quality Standards

for low-threshold reporting mechanisms on reporting suspicious cases of sexual exploitation of children

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INTRODUCTION

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Children in all countries of the world are exposed to the risk of human trafficking, sexual exploitation and online dangers such as grooming[1], sextortion[2], and the spread of abusive representations. The travel and tourism sector and the number of travellers are growing steadily. In several destinations, an uncontrolled development of tourism with no consideration for human rights puts children at higher risk. This makes it easier for travelling child sex offenders to locate new victims. Furthermore, in many places there are inadequate legal frameworks, cases of sexual exploitation of children remain unprosecuted and corruption has continued to persist. In order to effectively hold perpetrators criminally responsible, knowledge and evidence must be of good quality, in order to make decisions and initiate measures.

'REPORTING AN INCIDENT OF SEXUAL EXPLOITATION OF CHILDREN IN CONNECTION WITH TRAVEL AND TOURISM IS THE FIRST STEP TOWARDS ACTIVATING COURT PROCEEDINGS AND VICTIMS' ACCESS TO JUSTICE. IF INCIDENTS ARE NOT REPORTED, NO TRIAL CAN TAKE PLACE.' [3]

One of the key preconditions for ending sexual exploitation of children in travel and in tourism is the prosecution of perpetrators. States have taken valuable steps to establish consulting and reporting mechanisms, such as hotlines and helplines. However, victims of sexual exploitation still insufficiently use these mechanisms. For this reason, reports of indications and suspicions from outside parties, tourists, travellers, witnesses and experts have become more important. The promotion and establishment of low-threshold reporting mechanisms[4] are also increasingly essential. This is because, some people may be reluctant to directly contact law enforcement authorities, especially when they have to provide personal information and personal data. With the creation of a low-threshold mechanism, the anonymity of the reporters towards the police may be preserved to some extent. However, this can also imply disadvantages for law enforcement in terms of preservation of evidence. Next to receiving information on possible suspects, indications from travellers can also help to identify new trends and destinations in which the sexual exploitation of children occur more frequently. This information is essential for effective prevention work.[5]

Starting Position

An important success of recent years in the development of reporting mechanisms has been the international **online-reporting platform** www.dontlookaway.report,

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1   The term 'grooming' refers to the targeted initiation of sexual contacts with the intention of abuse.
2   The term 'sextortion' is composed of the English words sex and extortion and includes criminal acts on the Internet, such as sexual extortion.
3   The term 'sextortion' is composed of the English words sex and extortion and includes criminal acts on the Internet, such as sexual extortion.
4   Reporting mechanisms are reporting systems (such as by telephone, e-mail or online platform) and their structure, through which information and suspicious cases can be reported to various organizations - as well as directly to the police. Low-threshold reporting mechanisms, on the other hand, act as an interface between the reporting parties and the cooperation partners, such as the police.
5   Czarnecki, Dorothea: Many cases - few convictions Sexual exploitation of children abroad by German perpetrators, 2016.

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which was initiated by ECPAT[6] in 2014, and enables low-threshold reporting of indications and suspicious cases of sexual exploitation of children in the context of travel and tourism. The international platform offers reporting mechanisms from 20 countries[7] (17 countries from the EU, Mauritius, Ukraine and the USA) and is available in five languages: English, French, German, Spanish and Russian. This low-threshold reporting platform has proved to be an effective tool, as suspicious child abuse cases are reported across Europe, and in some cases, have also led to arrests.[8]

The further improvement and quality assurance of low-threshold reporting mechanisms was at the forefront of the development of these Quality Standards. As part of the EU project 'Alert Actors Report: A protective environment for children to live free from sexual exploitation in the travel/tourism/hospitality sector', five ECPAT organizations together with their cooperation partners carried out two studies in advance[9]: an international study[10] on how to overcome obstacles travellers may ecperience to report suspicions of sexual exploitation of children when they witness it abroad, as well as a comparative study[11] on current low-threshold reporting mechanisms.

Among the main obstacles of reporting are, in addition to the general lack of awareness of the issue and the reporting platforms, certain inhibitions such as: the uncertainty about whether a crime has actually happened, the fear of consequences and of false accusations, the fear of getting the child or children into trouble, and the uncertainty that nothing may happen with the report or that there is no possibility for anonymous reporting. The main reasons which motivate people to report are: knowing what will happen with the report; knowing the role of the person reporting after a report; examples of success stories; the ability to make anonymous reports and the wish to receive feedback or a direct response.

On the basis of the results and recommendations from these two researches for the further development of low-threshold reporting mechanisms these Quality Standards were developed. Furthermore, organizations and experts from the ECPAT network as well as external experts submitted their feedback and expertise.

The aim of this document is to give the Quality Standards a character of commitment which all (new) members of the portal www.dontlookaway.report should work on to achieve. However, it will be up to the operators of the reporting mechanisms to establish a procedure which regulates the accession-process of new organisations or partners. It should be borne in mind that the Minimum Standards should serve as a criterion for participation, but at the same time new interested partners should also be given the opportunity to familiarise themselves with the standards, to check the possibility for implementation in the national context and to develop their organisations accordingly within a determined and realistic period of time. When handled this way, standards can help to promote the development of organisations and strengthen their potential.

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6   ECPAT is a worldwide network of 107 organizations in 95 countries (as of August 2019) committed to ending the sexual exploitation
     of children through prostitution and trafficking, online, travel and tourism.
7   Release September 2019
8   ECPAT International: Global Study on the Sexual Exploitation of Children in Travel and Tourism: Perpetrators on the Move, 2016, p. 69.
9   A total of five countries were involved in the studies, which despite their size are not representative.
10   Defence for Children – ECPAT the Netherlands: Reluctance to report sexual exploitation of children related to travel and tourism,
     2019.
11   ECPAT France: Comparison of European low-threshold reporting mechanisms to gather good practices and needs, 2019.

FRAME OF REFERENCE

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The main frame of reference is the **UN Convention on the Rights of the Child** and its three additional protocols form the central basis for the work of ECPAT[12]. According to the Convention on the Rights of the Child, all young people under the age of 18 are to be regarded as children or adolescents and are particularly in need of protection and support due to their age. ECPAT actively and preventively operates against all kinds of violations of children's rights worldwide. However, the main focus of the association's work is the protection against sexual exploitation. ECPAT's daily work is based on strengthening the rights of all children, improving their chances of development, and protecting them from possible dangers. Most countries have criminal laws and social protection systems that protect children and expose abusers to prosecution. However, in some countries, state legal systems do not have sufficient resources to effectively and promptly deal with perpetrators, and to implement the rights guaranteed to children. With 'extraterritorial legislation' on child abuse and exploitation, prosecution under national law is possible, even if the sexual offence was committed outside the perpetrator's country of origin.

Low-Threshold

In social work one speaks of **low-threshold**[13], if the prerequisites, the effort to access, and the use of offers are as low as possible. By low-threshold in relation to reporting mechanisms we mean the creation of the easiest possible access to reporting mechanisms. Therefore, the barriers to entry as well as inhibitions should be minimized in order to appeal to as many people as possible, and to enable quick, unbureaucratic use. This means that the reporting mechanisms can be used at any time free of charge, without any obligation, voluntarily and, if available, anonymously.

Scope of Quality Standards

This document serves as guidance for the quality assurance and development of low-threshold reporting mechanisms. The following Quality Standards are to be understood as:

- **Recommendation for action.** The Quality Standards address operators of reporting portals and NGOs providing low-threshold access to reporting mechanisms, as well as organizations recommending direct reporting to law enforcement authorities.
- **Minimum Standards.** The Minimum Standards[14] address (new) partners of the reporting portal www.dontlookaway.report. Within this portal, these standards are regarded as minimum standards.
- **Internal guidelines and guidance.** They contribute to the transparency, exchange and improvement of the internal work processes of ECPAT and its partner organizations.
- **They provide information** for stakeholders, cooperation partners and reporters as well as clarify information on services of low-threshold reporting mechanisms.

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12   Optional Protocol on the involvement of children in armed conflicts; Optional Protocol on the sale of children, child prostitution and child pornography; Optional Protocol on individual complaints.
13   Mayerhofer, Hemma: Low threshold in social work. Functions and forms from a sociological perspective. 2012, S 147.
14   See Minimum Standards, page 18.

The current Quality Standards are not all-encompassing, but focus on the following concerns:

- **Practicality:** The standards are useful and practicable in everyday work life, and applicable to a wide range of organizations.
- **Transparency:** The standards offer a high degree of internal transparency in the use of information, data, and working processes within the framework of the respective applicable data protection regulations.

Objectives of Low-threshold Reporting Mechanisms

The implementation of these Quality Standards depends on country-specific conditions and the possibilities of the individual organization. Low-threshold reporting mechanisms serve to achieve the following objectives:

- to protect reporters and victims
- to hold perpetrators accountable under criminal law
- to optimize and improve the reporting process
- to reduce obstacles before a report is made
- to increase the number and quality of reports
- to improve cooperation with partners and experts
- to improve processing and documentation according to technical criteria
- to improve the public visibility of reporting mechanisms
- to improve the quality of results

QUALITY STANDARDS

In the following, a list of criteria is formulated to ensure that the work of the organizations and operators of reporting portals meet the Quality Standards. These are to be understood as recommendations for action which should be fulfilled in the best possible way with regard to financial and personnel resources. The quality criteria are addressed and applicable on three different levels - structure, process, and result.

A. Structural Quality

The structural quality meets the requirements and sets the conditions for professional implementation. It contains the **organizational framework and resources** required to provide the services. These determine, whether reporting mechanisms will be used, whether they lead to the desired objectives, and whether the health and working capacity of employees is guaranteed in the long term. The following standards determine the structural quality:

1. **Financing**
2. **Technical and spatial equipment**
3. **Child Protection Policy**
4. **Competence and qualification of employees**
5. **Availability of (professional) support**
6. **Networks and cooperation**
7. **Feedback culture and complaint management**

A1. Financing

Financing is a basic prerequisite for the operation of reporting mechanisms. It is the organization's responsibility to ensure sufficient financing and to guarantee, technical-, spatial equipment as well as human resources. Financial means and expertise are not only necessary for handling incoming reports, but also to promote the reporting mechanism to the target group(s). Reporting mechanisms should be supported by the government as much as possible, as a service offered to the public. The reporting mechanism should have lobbying efforts within national and international bodies to seek recognition, in order to ensure sustainable financing. The financing of the reporting mechanisms depends on the organization, but is usually carried out through subsidies. Therefore, the acquisition of subsidies forms the basis for maintaining the professional performance of reporting mechanisms.

> » Ensuring **adequate funding and expertise for the promotion** of reporting portals.

A2. Technical and Spatial Equipment

The aim of reporting mechanisms is to receive and take in, indications or suspicious cases of sexual exploitation of children in tourism and during travel. This can be done online, via a reporting portal, by telephone or by e-mail.

Employees should be guaranteed a friendly, protected, and undisturbed atmosphere. This includes, for example, office space with workstations and corresponding office

technology including software, telephone connections, answering machines as well as lockable office- and meeting rooms. The offices should be well accessible. As the information and material transmitted via the reporting mechanisms is highly sensitive, IT security and data security of the office should be ensured at all times. Depending on the amount and kind of incoming reports, investments for separate server and data storage rooms should be taken into account.

> » Employees are provided with **a workplace with appropriate office technology. IT and data security should be ensured at all times.**

A3. Child Protection Policy

Each organization which operates reporting mechanisms has developed and implemented a Child Protection Policy[15]. A Child Protection Policy ensures that the protection of children is integrated into one's own work as a quality feature. This policy should include a code of conduct on child protection, criteria for staff recruitment, as well as procedures for internal review and internal suspicious cases. The code of conduct guarantees a professional and personal standard of child protection. It requires people who come into direct contact with children on behalf of the organization, to submit a criminal record certificate[16] in accordance with the standards of the respective country. This should apply to current and new employees.

> » The organization has an **internal Child Protection Policy**, which is based on the international minimum standards[17], but at least includes a code of conduct on child protection standards in Human Resources Policy, and a procedure for dealing with suspicious cases.

A4. Competence and Qualification of Employees

The selection procedure of employees is based on criteria of the internal Child Protection Policy. Proper background and reference checks on applicants are also carried out in advance. All employees meet relevant basic requirements and offer different qualifications to form an interdisciplinary team, which also includes communication and campaign experts. Staff is regularly coached in accordance with their tasks and functions, and receive well-founded training which prepares them, among other things, for the task of receiving incoming reports. Ongoing reflection on their work takes place through regular team meetings, team case discussions, as well as supervision, if necessary.

> » Organizations should ensure a **prudent recruitment- and selection process including background and reference checks** in accordance with their Child Protection Policy.
> » Employees receive regular coaching for their tasks.

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15   See Child Protection Policy of ECPAT International, www.ecpat.org
16   In Austria, for example, the special criminal record certificate 'Kinder- und Jugendfürsorge' must be submitted for this purpose.
17   See https://www.keepingchildrensafe.org.uk

A5. Availability of (Professional) Support

The organizations and operators of reporting mechanisms should promote an organizational and leadership culture which encourages employees at all levels to express their views and concerns without fear of judgment or criticism. There should be an open, accessible, and supportive environment to minimize psychological barriers within the organization. It is particularly important that employees who deal with difficult and sometimes stressful suspicious cases can openly share their experience with colleagues and supervisors. In order to identify and avoid emotional or psychological problems caused or exacerbated by work, all employees should regularly be offered individual or group counselling as well as debriefing, ideally in form of supervision. This is crucial to the employees working at a reporting mechanism.

Furthermore, an Employee Handbook will support the implementation of these issues and may include regulations on e.g. induction, trainings, working conditions, welfare and support. It gives clear advice to employees and creates a culture where issues are dealt with fairly and consistently.

> » The organization lives an open, accessible and supportive organizational- and leadership culture and **regularly offer professional support** to employees.

A6. Network and Cooperation

An important prerequisite for the professional work of the operators of low-threshold reporting mechanisms is the establishment of a cooperation network with law enforcement authorities, the travel and tourism industry, governments, other relevant reporting mechanisms, youth protection organizations, specialized counselling centres, NGOs – such as ECPAT organizations –, as well as with child protection experts.

Signed cooperation agreements, such as a Memorandum of Understanding, may be helpful in this context for defining the objectives and roles of cooperation partners, responsibilities, the exchange of data and information, the legal situation regarding child protection, criminal prosecution and the scope and duration of the respective cooperation.

> » The **establishment of a professional network** is a basic prerequisite for professional work.
> » Cooperation agreements regulate e.g. **roles, responsibilities and the exchange of information and data between the parties.**

A7. Feedback Culture and Complaint Management

The organizations operating reporting mechanisms aim to create an open work attitude and feedback culture. In this way, those who are seeking advice are informed about the possibility of feedback in relation to the work of the organizations. There are clear and defined feedback- and complaint channels.

> » The reporting mechanisms include clearly defined **feedback- and complaint channels.**

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B. Process Quality

Process quality describes **the working process**. All services provided follow the standards for work in child protection. The organizations bear the responsibility for their work and design services independently within the framework of their professional and qualitative specifications. The key processes are:

1. **Low-threshold access and reachability**
2. **Information and communication**
3. **Anonymity**
4. **Data protection**
5. **Case management**

B1. Low-Threshold and Accessibility

Access to the reporting mechanisms is designed to be low-threshold. This means, that they are open to all reporters, easy to use, and free of charge. Reporters can report at any time via the reporting portal and receive advice on the reporting process by telephone, e-mail or during office hours. Upon receipt of an online report with contact details or a report by e-mail, the reporter will receive confirmation of receipt or will be contacted within 48 hours - or on the first working day following the report respectively. This can easily be implemented by an automatic response message. In case of reports made by telephone outside of office hours, information concerning availability is provided on the answering machine and on the organizations homepage.

> » **Low-threshold access** ensures easy reporting.
> » Reporters will receive a confirmation or be contacted within 48 hours, **ideally by an automatic response message**.

B2. Information and Communication

The reporting portal provides up-to-date information as well as instructions on the reporting procedure, and the reporting process:

- General information on the topic (e.g. how reports can help children; that even little information is useful for the police to investigate cases and to identify hotspots and trends)
- How to make a report.
- Clear, short and easy to find reporting form.
- FAQs for further information and instructions.
- The possibility to make an anonymous report (if available).
- What steps are taken after a report?
- What is the role of the reporter after a report?
- Success stories of previous reports.

In addition, the following information clarifies the facts, goals, and limits of a reporting portal:

- Data protection regulations, anonymity, confidentiality
- National legislation and extraterritorial prosecution
- If applicable, listing and linking to the cooperation partners
- Quality Standards

- Contact information and possibility to complain
- Information on organization and financing

A reporting portal (e.g. in the form of a web page) enables the incoming of reports and contains an online reporting form via which the reporter may also send relevant information anonymously, if available. The reporting form itself provides corresponding text-fields and the possibility to provide information on type, place, and time of the observation, as well as on people involved, and further comments. Mandatory fields are clearly marked and an in-between save option gives the opportunity to pause the report or to add something later. There should also be a possibility to upload images or documents. The form should be designed in such a way that the reporter is directed to report particularly relevant information. In order to increase the quality of information for police investigations, it is usually necessary to pay attention to the so-called 'Golden Ws' (when, where, who, what, with, why is the situation suspicious, how).

There is a clear communication and target group specific public relations strategy. The reporting mechanisms are made known, through posters, folders, (social media) campaigns and events as well as on the Internet, and whenever possible in traditional media. Online visibility in particular is to be supported by the use of search engine optimization and Google Key / AdWords. A clear analysis of search behaviour and keyword analysis including the implementation of specific terms and words on the website, will support the visibility of the reporting mechanisms. The website is compatible for smartphones and other mobile devices. Furthermore, it contains a short summary in English or another relevant foreign language with a reference to the international reporting portal.

Words and images transport messages and convey certain ideas about how children affected by sexual violence and exploitation are socially perceived. Reporting and communication are important elements in contributing to the realization of children's rights. In doing so, emphasis is placed on professionally differentiated and responsible reporting and the following communication standards[18], among others, are observed:

- The dignity of the person is respected in communication (externally and internally).
- The reduction to victim or any other stereotypical role is avoided.
- Pictorial representations containing an illustration of sexual exploitation are neither possessed nor published. Children must always be clothed in photographs and pictorial
representations.
- Where possible drawings of children should be given preference to pictures of real children.
- Before publication, the persons concerned will be informed and their consent obtained.
- Pseudonyms will always be used unless otherwise agreed.

In verbally defining the different forms of abuse and exploitation of children, the Luxembourg guidelines[19] should be respected.

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18   See also Child Protection Policy of ECPAT Germany and ECPAT Austria.
19   http://luxembourgguidelines.org Terminology guide for the protection of children from sexual exploitation and sexual abuse, 2016.

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> » Each **reporting portal should have a simple and intuitive operating unit and contain up-to-date information.**
> » A clear **communication strategy, target group-specific public relations**, and search engine optimization support online visibility.
> » Each reporting portal **has a short info in another relevant language**, and a specific reporting form.
> » Communication and information in words and images are in line with communication standards and the Luxemburg Guidelines.

B3. Anonymity and its limitations

The operators of a reporting portal provide information on how to deal with anonymous reporting. Anomymous means reporting without actively disclosing ones identity. The organisations are to communicate transparently about anonympus reporting possibilities and their limitations on their reporting portal. In the case of reporting without disclosing any personal information, the person making the report declines the possibility of further contact, feedback and information. It should be me made clear that the chance of successful convictions will decline in comparison to non-anonymous reports. Therefore, reporters should be encouraged to disclose their identity. Anonymous reporting should only be used when people feel in danger. If the possibility for anonymous reporting is offered, it should be clearly stated, to what extent anonymity can be guaranteed, and what this means in the context of police investigations. This includes the information on which of the reporter's data is recorded and is to be made available to law enforcement authorities upon request.

On the reporting page, reporters find information on how to deal with anonymity / reports without personal information and which system the respective reporting page uses.

> » Each **reporting portal encourages** reporters to provide contact details. In case of **anonymous reporting - reports without personal information –** clear information is provided by the portal on possible tracking of IP/URL by authorities in cases of investigations.

B4. Data Protection

There is absolute transparency on data processing and the use of personal information. It must be clear for reporters what happens to their data. In particular, reporters are informed about the nationally applicable data protection policies applicable to the report (e.g. General Data Protection Regulation (GDPR) in the EU) as well as about anonymity and confidentiality. Furthermore, it must be clear that prosecuting authorities receive data when a justified report is made. Should there be further investigations or even court proceedings, these data may also be accessible to third parties (e.g. the defendant's defender). The procedure should be clearly agreed upon with the respective authorities in advance and information presented accordingly.

If the reporting portal is subject to the GDPR, the reporter must confirm a checkbox with the corresponding information on the GDPR, and accept the conditions. Additional information should refer to the data protection declaration of the reporting portal, which for example includes data storage duration.

The duty of confidentiality applies to all employees of reporting mechanisms in accordance with national legal policies, and also to the legal entity. In addition, as with anonymity, it should be clarified under which circumstances confidentiality cannot be guaranteed. Furthermore, to protect the data against manipulation, the encryption of website data as well as the data transmitted should be taken into account. It is strongly recommended to check the procedure, how the incoming report and its data are being processed, stored and further dealt with (i.e. shared with police and/or other authority) with a data protection specialist/lawyer of the respective country.

Each reporting portal provides information on the nationally applicable data protection provisions as well as on its own data protection declaration, anonymity and confidentiality.

B5. Case Management

Even though the low-threshold reporting mechanisms listed on the www.dontlookaway.report portal are meant for reports on suspicions of sexual exploitation of children in travel and tourism, the mechanisms also receive other types of reports. These suspicious cases require differentiated reactions and measures. The reports should be categorized according to the suspicious case, such as:

• Child sexual exploitation/abuse by national citizen in another country
• Child sexual exploitation/abuse by national citizen in the home country
• Online abuse materials
• Other forms of violence against children

Documentation is an essential part of professional work. Information should be traceable (what, when, who) and protected (safe from unauthorized access). Information should also be deleted after a period of time, according to the data protection policy.

The following documents could serve as an orientation – especially for new partner organizations – and can be processed and recorded as part of a report:

• Report overview table (continuous numbering of reports, key data)
• Data entry sheet (internal document: initial entry of information from the reporting portal / telephone / e-mail)
• Progress and case documentation (for chronological documentation and summary including final protocol)

These procedures can be adopted, supplemented or adapted as required. Depending on the national framework and conditions, suspicious cases are forwarded to different cooperation partners.

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Monitoring and evaluation of the progress and case documentation procedures should take place at different levels, e.g. through a four-eye-principle, team meetings, team case meetings, counselling, supervision or through further education and training.

> » **In case management**, reports and messages are recorded, categorized, documented and, if necessary, forwarded to different cooperation partners.
> » The following procedures are used for monitoring and evaluation: progress and case documentation as well as regular team exchange, e.g. team meetings, team case discussions, counselling, supervision and further training.

C. Quality of Results

The quality of results provides information, as to whether the defined objectives with regard to the services provided could be achieved from the point of view of all participants. This is how, the **effectiveness and efficiency** of low-threshold reporting mechanisms are tested while maintaining structural and process quality. The following criteria play an important role:

1. **Use and acceptance of the offer**
2. **Employees' view**
3. **Exchange and reflection with cooperation partners**
4. **Evaluation and annual report**
5. **Achievement of objectives based on Quality Standards**

C1. Use and Acceptance of the Offer

Each year, the organizations evaluate the number of website-visitors and suspicious cases received using web-statistics, qualitative and quantitative data. This includes the number of reports received via telephone, e-mail, and reporting form. From a technical point of view, it is necessary to pseudonymize the data, so that an evaluation but no traceability is possible. An evaluation provides information on how the use of the service is developing and gives potential for reflection on the work, and further development of the reporting mechanisms.

> » The organizations evaluate the **access to the reporting portal, as well as the received reports,** as part of their annual evaluation, qualitatively and quantitatively.

C2. Employees' View

In terms of evaluation of their own work and for the purpose of monitoring by the employees, different instruments prove to be helpful: e.g. team meetings, team case discussions, supervision and employee discussions, conference days, as well as general self-reflection.

> » The **various possibilities of reflection** serve to ensure quality assurance and reduce pressure on employees.

C3. Exchange and Reflection with Cooperation Partners

Exchange and reflection with network- and cooperation partners on joint cross-case cooperation and the achievement of objectives in terms of the quality of results should take place regularly, in order to record an analysis of the cooperation relations, as well as an external view, and evaluation. Information from the cooperation partners on the progress of the suspicious cases will provide information on e.g. whether the essential information is being reported and how to further increase the quality of the reports. In view of the limited resources of cooperation partners, it is recommended to limit the evaluation to few best practice examples of the respective evaluation period for further reference.

> » Regular **exchange with cooperation partners.**

C4. Evaluation and Annual Report

The organizations inform their partners of the reporting portal about the results of their work by publishing an annual report. This contains an overview of the main areas of work, as well as statistical information, access figures to the reporting portal, information on the satisfaction of employees, and on the reports received during the reporting period and, if possible, positive results that led to a criminal investigation. The evaluation also serves to improve internal work processes.

> » Organizations provide information on the **results of their work in an annual report.**

C5. Achievement of Objectives based on Quality Standards

By monitoring within the team and with cooperation partners, the recommendations for action of the Quality Standards are reviewed with regard to their speed and efficiency of dealing and processing reports, as well as to the low-threshold reporting mechanisms including case management.

> » **The recommendations for action of the Quality Standards are regularly reviewed for efficiency and target achievement.**

CONCLUSION

Regarding the effectiveness of low-threshold reporting mechanisms, the visibility of the reporting mechanism, clear information and instructions on the reporting process as well as the possibility of anonymous reporting, play an important role. At the same time the interest of the reporters is to find out more about the follow-up of suspicious cases. The treatment of anonymous reports is one of the great challenges which requires a clear regulation between the presentation of evidence, confidentiality, and data protection.

These Quality Standards serve to improve and optimize the reporting and working processes of the operators of low-threshold reporting mechanisms for the benefit of all parties involved. These processes can vary due to different financial and personnel resources of the organizations, as well as to country-specific conditions. The focus lies particularly on facilitating a process of quality development by making information and standards available as recommendations for action, as well as Minimum Standards.

MINIMUM STANDARDS

These Minimum Standards are part of the *Quality Standards for low-threshold reporting mechanisms on reporting suspicious cases of sexual exploitation of children.* The Minimum Standards address (new) partners of the reporting portal www.dontlookaway.report. Within this portal, these standards are regarded as minimum standards and serve as a criterion for participation. New partner organisations are invited to participate by implementing these standards. The implementation process will be carried out within a determined and realistic period of time and may vary due to country-specific conditions, possibilities of the individual organizations as well as different financial and personnel resources.

Structural Quality

> » Workplace with appropriate office-technology.
> » The organization has an internal Child Protection Policy, which includes a prudent recruitment and selection process.
> » Building a professional network and striving for written cooperation agreements with relevant partners.
> » Clearly defined feedback- and complaint channels.

Process Quality

> » The reporting mechanism is easy-to-use and may offer anonymous reporting / reporting without personal details.
> » For reports, which include contact details, feedback will be given within 48 hours.
> » A specific webpage with a reporting form and a short info in another relevant language is provided.
> » Clear communication strategy to improve search engine optimization, awareness and visibility.
> » Communication and reporting should be carried out in accordance with the communication standards and Luxembourg guidelines.
> » The reporting portal provides information on the subject area, on nationally applicable data protection regulations and explains the reporting process.
> » Case documentation: All reports are recorded, categorized, documented and, if necessary, forwarded to different cooperation partners.
> » Regular team exchange through team meetings, further training and the possibility for supervision if needed.

Quality of Results

» **Annual evaluation** of e.g. the number of website-visitors, numbers and categories of reports received, and the satisfaction of the employees.
» Regular **exchange and reflection with cooperation partners** on the course of the suspicious cases.
» Each organization informs about the results of its work in **an annual report.**

APPENDIX

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Checklist for user-friendly reporting mechanisms[20]

Criteria reporting websites

> »   It has a clear layout.
> »   It is easy to see where to make the report.
> »   It is found easily in search engines.
> »   It is smartphone-compatible.
> »   It contains images, graphics and short videos.

Criteria reporting forms

> »   The form is not too long and the questions not too difficult.
> »   Provide examples of information to show what is expected and what will happen with the report.
> »   Have an in-between save option to pause the report or add something later.
> »   Mandatory fields are clearly marked.
> »   Have the possibility to upload documents and pictures (when it is safe to take pictures) and includes possibility of geotagging.
> »   Information on data protection regulations that apply to that report and on what will happen to the data submitted.

Criteria anonymous reporting

> »   Clear and transparent information on anonymity and confidentiality.
> »   Responses are given to non-anonymous reporters (possibly automatically).

Information on reporting websites

> »   General information on the topic (e.g. how reports can help children; how little information is useful for the police to identify hotspots and trends).
> »   How to make a report.
> »   Clear, short and easy to find reporting form.
> »   FAQs for further information and instructions.
> »   The possibility to make an anonymous report, (if available).
> »   Which steps are taken after a report?
> »   What kind of feedback to the report is possible to give?
> »   What is the role of the reporter after a report?
> »   Success stories of previous reports.
> »   Information on data protection and what happens to the data.

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20   See also: Defence for Children – ECPAT the Netherlands: Reluctance to report sexual exploitation of children related to travel and tourism, 2019; and expert interview with Martin Sternsberger – WP-Stars.

> » Homepage includes prominently visible link to Data Privacy Policy, information on anonymous reporting and feedback option.

FAQ section including information

> » What to do if someone is not sure and how false accusations are being prevented.
> » Important characteristics about signals of child sexual exploitation.
> » Suspicious situations.
> » Key details to report.

Data Security

> » Encryption: website data must be encrypted (e.g. Secure Socket Layer).
> » Data transmission: The data received via the reporting form should not be transmitted unencrypted by e-mail.
> » Access protection: The data must be protected against manipulation.
> » Storage: The duration of data storage must be specified.

Search Engine Optimization

> » Clear analysis of search behaviour: keyword analysis and search engine optimized web texts.
> » The terms and words used to search the site should appear on the site.
> » Google Ad Words via Google Grants for NGOs worth 10.000 € / month for free.

Usage of images

> » The dignity of the person is respected in communication.
> » The reduction to victim or any other stereotypical role is avoided.
> » Pictorial representations containing an illustration of sexual exploitation are neither possessed nor published. Children must always be clothed in photographs and pictorial representations.
> » Where possible drawings of children should be given preference to pictures of real children.
> » Before publication, the persons concerned will be informed and their consent obtained.
> » Pseudonyms should always be used, unless otherwise agreed.
> » Self-check: Do I have permission from the portraited person? If it was my child, would I like to portray them that way?

Youth Participation

The active participation of children and young people is an integral part of ECPAT's work. All partners participating in the Alert Actors Report Project have experience with integrating youth in their programs and foster participation opportunities in their structures and projects. The Alert Actors Report Project includes young people based on the Lundy Model of Participation, giving them not only the opportunity to express their opinions, but also the audience and influence to have their opinions adequately taken into account.

For the development of Quality Standards for low-threshold reporting mechanisms on reporting suspicious cases of sexual exploitation of children, young people's opinions were included in the standards regarding the usability of mechanisms such as reporting websites and reporting apps as well as awareness raising and online visibility.

To this end, the results from 6 focus groups held with students in Austria, Belgium, Germany, France and the Netherlands, on the obstacles to report were included in the Quality Standards. In addition, an online survey was carried out in Austrian tourism schools, where 225 young people between the age of 14 and 20 gave their opinion on the use and appearance of mobile online reporting tools, specifically an app. The survey consisted of 10 questions and lead to the following conclusions and recommendations in regards to the developed Quality Standards:

Criteria for usability

> » Reporting websites must be **compatible for mobile devices**.
> » An app should not take up additional **memory** space.
> » The reporting mechanism must be made **known** to potential reporters and be **easily found** online.
> » Provide clear **information** on what happens with the **data** collected by the respective reporting mechanism.
> » Provide **information** about **data protection** laws and its **limitations** for reported cases.
> » **Pre-installed** reporting apps are more likely to be used, since there is no need to search for reporting mechanisms, and are therefore **very low-threshold.**
> » **Easy, instant access** to reporting tools is necessary to enhance low-threshold.
> » A reporting **app** presents **less obstacles** to report.
> » Any reporting tool needs to be **quick, easy to use and intuitive** as well as provide **guidance** on how to report.
> » Any reporting tool needs to be **modern, clearly structured, easy to use and intuitive** by design.
> » Reporters need to **understand the purpose** of their report.
> » Reporters need to be **informed** about the reporting **process.**

Federal Chancellery
Federal Minister for Women,
Families and Youth

Federal Ministry
Republic of Austria
Agriculture, Regions
and Tourism