

REVIEWING CHILD SEXUAL ABUSE MATERIAL REPORTING FUNCTIONS ON POPULAR PLATFORMS

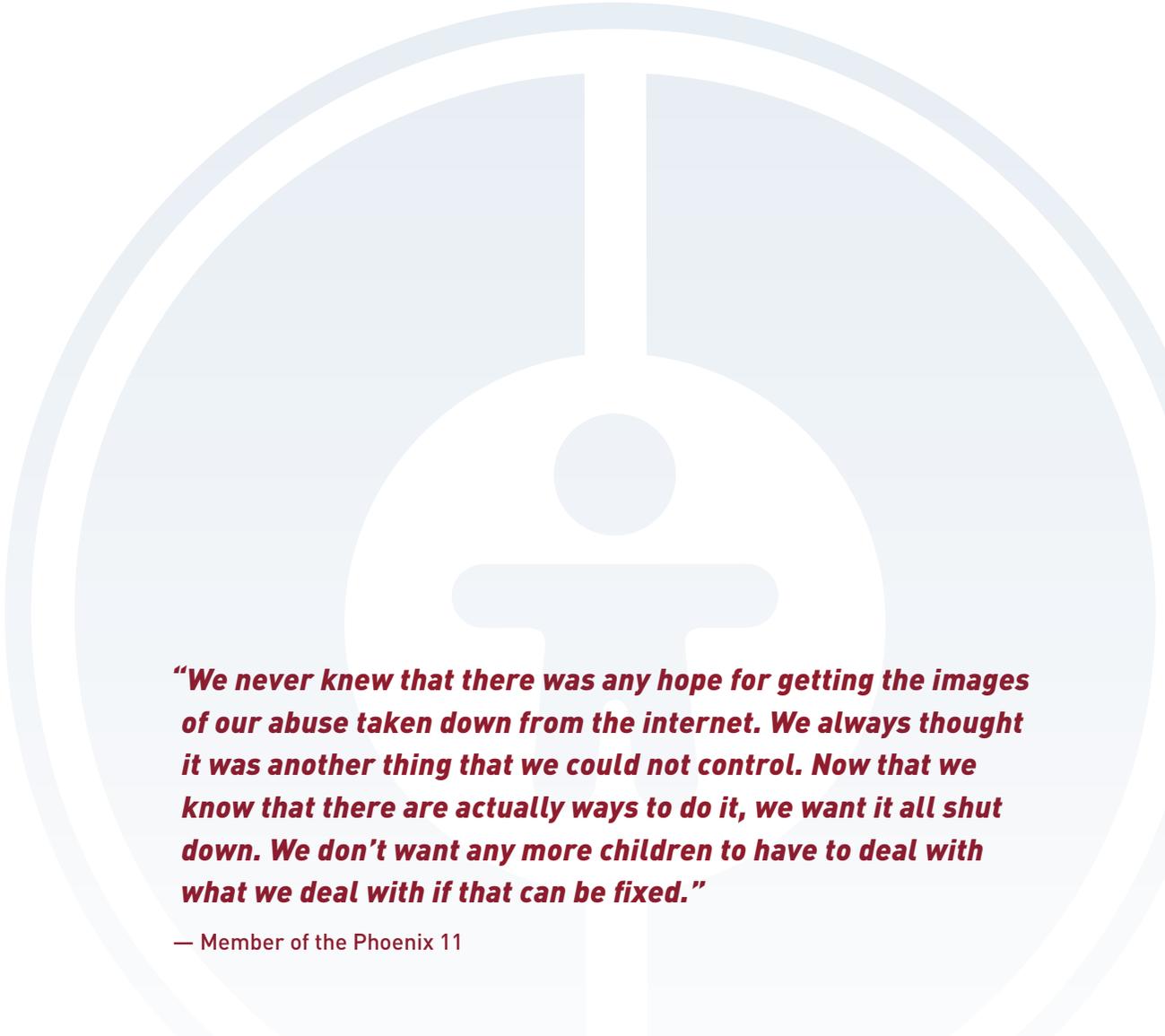
Executive Summary

A Review by



CANADIAN CENTRE *for* CHILD PROTECTION®

Helping families. Protecting children.



“We never knew that there was any hope for getting the images of our abuse taken down from the internet. We always thought it was another thing that we could not control. Now that we know that there are actually ways to do it, we want it all shut down. We don’t want any more children to have to deal with what we deal with if that can be fixed.”

— Member of the Phoenix 11

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All screenshots within this document were taken between September 16 and 23, 2020, and reflect what was visible to the user on the relevant platform mostly from within Canada. Screenshots taken while logged in are from accounts owned or controlled by C3P. The Canadian Centre for Child Protection Inc. has made reasonable best efforts to ensure all information in this document is accurate as of September 23, 2020. E. & O.E.

Survivor statements have been contributed by members of the survivor community who work with and are supported by the Canadian Centre for Child Protection Inc. They, more than anyone, understand the issues at stake and they are the ones who have had to endure the very real harms the current legal landscape has facilitated.

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Reviewing child sexual abuse material reporting functions

Abstract

Millions of images of child sexual abuse circulate freely on the internet each day, not only in obscure corners of the dark web, but also on some of the most popular web platforms. The Canadian Centre for Child Protection's (C3P) research found most web platforms lack content reporting functions specific to child sexual abuse material (CSAM). In contrast, with copyright infringement, reporting tools devoted to the issue are largely a universal standard.

Our surveys with survivors — many of whom attempt to self-monitor the spread of their abuse imagery — often cite ambiguous reporting functions as a factor in their ongoing re-victimization. By failing to adopt CSAM-specific reporting tools, these companies inhibit their ability to take swift action in prioritizing and removing this illegal content.

This state of content reporting is generally inconsistent with the goals of the *Voluntary Principles to Counter Online Child Sexual Exploitation and Abuse*, established by the Five Country Ministerial, and adopted by some of the largest technology companies. C3P provides five key recommendations technology companies can adopt to immediately reduce harm to children and survivors on page 25.

About the Canadian Centre for the Child Protection

The Canadian Centre for Child Protection (C3P) is a national charity dedicated to the personal safety of all children. C3P operates Cybertip.ca, Canada's national tipline to report child sexual abuse and exploitation online, as well as other intervention, prevention, and education services for the Canadian public.

In January 2017, C3P established Project Arachnid — a web platform designed to detect known images of child sexual abuse material (CSAM) on the clear and dark web and issue removal notices to industry.¹

Since its launch, Project Arachnid has detected 24+ million suspected images of CSAM for analyst review, and issued more than 6.3 million takedown² notices to industry.

C3P also supports survivors whose child sexual abuse was recorded and distributed online. Through our work with survivors, crucial contextual information about the nature of child sexual abuse material is collected and shared with stakeholders vested in the safety and protection of children.

In addition to our work with individual survivors, we now work with three survivor advocacy groups:

The Phoenix 11: For over two years, C3P and the National Center for Missing and Exploited Children (NCMEC) have been working with the Phoenix 11, a group of survivors whose child sexual abuse was recorded, and in the majority of cases, distributed online. This group has banded together as a powerful force to challenge the inadequate responses to the prevalence of CSAM online.

The Chicago Males: In the last year, C3P started working with a group of male survivors to learn about their experiences, and better understand the unique social stigma males face around sexual abuse. This group is working together to advocate for much needed change in addressing online child sexual abuse and supporting survivors.

¹ In this report, industry is defined as a group of businesses that intersect with user-generated content by way of the internet. It is used as a broad sweeping term, encompassing large and small technology companies.

² As of November 5, 2020.

The Aramid Collective: Earlier this year, C3P was introduced to a group of survivors who have been self-monitoring their own CSAM online and reporting to industry to get it removed. This group is using their knowledge and collective voice to help advocate for survivors and the urgent need to address the images and videos of sexual abuse that exist on many platforms, including some reviewed in this document.

Background and purpose of the report

Through our work with survivors over the last few years, particularly those attempting to contain the spread of images of their own child sexual abuse, a problematic theme began to emerge:

- Many of the tools for reporting and getting CSAM removed from many popular web platforms are ineffective, leaving victims feeling hopeless. This trend, which includes ambiguous reporting functions and the use of non-CSAM specific language, has been further observed in public reports to C3P's national tipline, Cybertip.ca.

Prompted by these concerns, C3P undertook a systematic examination of the content reporting mechanisms on prominent web platforms to identify gaps and provide recommendations to the technology industry to enhance their public CSAM-reporting tools.

In addition to issuing guidance on best practices, the study serves as benchmark against which each platform's reporting mechanisms can be compared to the Five Country Ministerial's³ *Voluntary Principles to Counter Online Child Sexual Exploitation and Abuse (Voluntary Principles)*.

On March 5, 2020, C3P and a group of survivors participated in meetings at the White House in Washington D.C. with ministers from the Five Country Ministerial, industry members, and NCMEC.

Following the event, the Five Country Ministerial released their *Voluntary Principles* in an effort to drive consistent and collective industry action. Six of the world's largest tech companies publicly signed on to these principles, including Twitter®, Facebook®, Microsoft®, Google®, Snapchat®, and Roblox®.

The principles — which have effectively established an industry standard— focus on the prevention of child sexual exploitation and abuse, highlighting the critical role industry plays in keeping children safe online and limiting re-victimization.

Two of the *Voluntary Principles* are particularly relevant to this report's findings:

Principle 1: Companies seek to prevent **known child sexual abuse material** from being made available to users or accessible on their platforms and services, take appropriate action under their terms of service, and report to appropriate authorities.

Principle 2: Companies seek to identify and combat the dissemination of **new child sexual abuse material** via their platforms and services, take appropriate action under their terms of service, and report to appropriate authorities.

³ The Five Country Ministerial is an annual forum for the Five Eyes intelligence alliance — which includes Australia, Canada, New Zealand, the United Kingdom, and the United States.

Methodology

All of the reporting functions were reviewed between September 16 and 23, 2020. The assessment included both desktop (Chrome) and mobile apps (iPhone). Mobile apps were obtained and downloaded from the App Store® available to Canadians. For desktop, testing was done from Canadian and American IP addresses, along with a Japanese IP address for some. When the reporting process between desktop and mobile apps was identical or extremely similar, the desktop version was chosen as the visual to display within this document. There were two instances, Pornhub® and XVideos™, where an app was not available in the App Store, in which case their mobile sites were reviewed using Safari™ on a mobile phone. In all cases, we used the reporting option we believed would be most likely used by a member of the public to report CSAM.

Prior to publication, all of the companies reviewed in this report were provided a copy of their platform assessments to ensure accuracy.



Reporting functions appear to be adjusted regularly. At least three platforms modified the methods in which to report concerns, or language in their reporting functions, during the course of this review.

On each platform and service⁴, C3P evaluated the availability of CSAM-specific reporting options for each of the following settings:

1. Within a post (e.g., Tweet, story, Snap)
2. A user
3. Within direct message (DM) or chat
4. Publicly-visible content while not logged into a platform⁵

“From infancy until I was 15, I was trafficked and used in child sexual abuse material (also known as child pornography) which continues to be shared widely across the internet. I spend hours every day searching for my own content, reporting thousands of accounts and posts sharing CSAM. When platforms don’t actively look for or prevent this content from being uploaded, the burden falls on me to have these images removed. Each time one account gets taken down, five more take its place. It’s like a hydra, a monster that I can never defeat. I’m not strong enough to take it down myself. It’s costing me my wellbeing, safety and maybe even my life. I’m tired. I shouldn’t find photos of myself as a child being raped when I’m just scrolling through my feed. I shouldn’t have to go looking for images of my own abuse. This isn’t my job.”

— Member of the Aramid Collective

Model in image: freemedia4illustrations

⁴In addition to assessing 11 platforms owned by five of the companies that signed on to the *Voluntary Principles*, another four popular platforms have been reviewed, including TikTok™, Discord™, Pornhub, and XVideos. Roblox is one of the companies that signed on to the *Voluntary Principles*, but unlike the other companies assessed in this document, Roblox does not allow users to send images or videos in the chat function. As such, we were unable to review Roblox using the categories listed in the Methodology. Additional platforms were selected for this review based on a number of factors, including reports C3P receives through Cybertip.ca, data from Project Arachnid, and information from the survivors C3P works with about platforms where they have attempted to have their own CSAM removed. This is just a sample of any number of other platforms that could also have been included in this review.

⁵Throughout this report, **publicly-visible** refers to content hosted on a platform that can be viewed without logging into an account on the platform.

Executive summary: Reporting CSAM on select platforms

There is an abundance of images and videos of children being sexually abused circulating on both the clear and dark web. Many internet users inadvertently come across this illegal and traumatizing content in the course of legitimate use of everyday platforms.

C3P has intersected with a number of survivors who feel they have been left with no option but to take it upon themselves to monitor the presence of their own child sexual abuse images, while attempting to get companies to remove it from their platforms. These survivors have been instrumental in identifying serious deficiencies in reporting tools for the public on a number of platforms, including some reviewed in this document.

Survivors surveyed by C3P have generally characterized their own experience reporting CSAM online as disheartening; exceedingly long delays in responding to their complaints, moderators challenging victims on the veracity of their report or, as is often the case, no response at all.

It is through this lens that research conducted by a team of C3P analysts found that while all platforms scrutinized as part of this report provide users with the ability to report illegal or inappropriate content, in nearly all cases it was impossible to explicitly flag content as CSAM.

In contrast, users concerned with issues related to copyright infringement, almost universally have access to formal reporting tools and clear instructions for initiating a complaint.

Why the need for CSAM-specific reporting options?

While the majority of platforms have reporting mechanisms in place for content at large, they rarely have a CSAM-specific process or menu options for users to report material that is (or believed to be) CSAM.

This is problematic for three main reasons:

1. The absence of issue-specific data based on user-generated reporting presumably undermines the ability of platforms to prioritize their content moderation for more urgent action. Curbing the spread of these illegal images across the internet requires prompt action.
2. Without accurate user-generated data on the prevalence of CSAM on their platforms, it's difficult for companies to properly gauge the effectiveness of their proactive measures designed to intercept CSAM. It likely also hinders their ability to provide timely information to child welfare and law enforcement agencies.
3. Survivors who attempt to halt the spread of images of their own child sexual abuse repeatedly cite ambiguous and non-specific reporting options on platforms as a key barrier to successfully getting images removed.

In addition to the lack of CSAM-specific reporting options, C3P researchers also identified a number of barriers for reporting content, including:

- Reporting structures that create strong disincentives for users to report illegal content, such as requirements to provide personal contact information.
- The inability to report publicly-visible content without first creating (or logging into) an account on the platform.
- Difficulty locating reporting tools on the interface with, at times, inconsistent navigation between desktop and mobile version of the platform.
- Inability to report specific users, user profiles, specific posts, or a combination of the latter.

In this report, these are noted as **Other reporting challenges**.

In addition, some positive indicators were also identified:

- Positive reporting functions: Steps that improve the reporting process but do not fit under the four reporting categories in the Methodology. For example, offering a text box that permits additional context to be included in a report is a positive function.
- Better practices: Reporting functions we recommend all platforms adopt. For example, offering child sexual abuse material as a reporting category, and having the ability to report concerns involving CSAM without having to be logged in.

Availability of CSAM-specific reporting options



	Category 1	Category 2	Category 3	Category 4
Availability of CSAM-specific options for reporting...				
	...from within a post (e.g., Tweet, story, Snap)	...for a user	...for images or videos received within a direct message (DM) or chat	...for visible content while not logged into a platform
Twitter				
Facebook				
Facebook Messenger™				
Facebook: Instagram				
Facebook: WhatsApp				
Google: YouTube®				
Google Hangouts®				
Google Search				
Snapchat				
Microsoft: Bing™				
Microsoft: Skype®				
TikTok				
Discord				
Pornhub				
XVideos				

Throughout this report, some platforms are listed as **not applicable** under one or more categories, as their platform does not offer the feature being reviewed.

When desktop and mobile reporting functions are inconsistent on a platform they are noted and categorized separately.

* TikTok Desktop Not Applicable.

** Discord Mobile Not Applicable.

Category 1: Availability of CSAM-specific reporting options within a post



No option to report a post as CSAM directly from the post	Can report directly from the post, under broad category of illegal material only	Can report content directly from the post under categories such as nudity, sexual activity, or pornography but no way to indicate a child is involved	Can report content directly from a post and can flag that a child is involved, but cannot report the content as CSAM	 BETTER PRACTICE: Can report content directly from a post and can report it as child sexual abuse or exploitation
Twitter Discord (desktop) Google Search XVideos (images)	Discord (mobile)	Snapchat	XVideos (videos) Pornhub Facebook Instagram YouTube TikTok	Bing

Not applicable: WhatsApp, Google Hangouts, Skype, Facebook Messenger

Other reporting challenges:

- Difficult to locate report forms (when there is no CSAM-specific reporting options from a post) (Twitter, Discord (desktop))
- All of the platforms that use report forms require personal information in order to submit the report, which may dissuade those who do not want their names connected to CSAM in any way (Twitter, Discord (desktop), XVideos, Pornhub)
- Individuals are directed to report CSAM to the hotline in their own country, where applicable (Google Search)
- Reporting process on mobile and desktop are different (Discord)
- Reporting process is different when accessing the platform through a browser versus accessing the platform on desktop (Discord)



XVideos: In order to submit their **Abuse Reporting Form**, individuals must provide their name, email, home address, a digital signature, and check a text box that states, "I swear under penalty of perjury that the information in this notification is accurate and that, to the extent my report involves the alleged violation of a legal right, I am the owner of such a right or authorized to act on the owner's behalf."

Pornhub: The **Reporting Abuse and Violations** page directs individuals to report CSAM via a **Content Removal Request**. To submit the request, individuals must provide their email, name, and a digital signature where it states, "By typing your name in the field below, you guarantee that you are the person being named and represented on this form and that all provided information is accurate."

Positive reporting functions:

- Report form includes the option to select **Distribution of child pornography** as a Trust & Safety issue (Discord (desktop))
- Text box provided to allow additional context when reporting directly from post (YouTube, TikTok (mobile), Snapchat (only when reporting a snap in the For you section))
- Open text boxes in report forms allow for additional context to report (Twitter, Discord (desktop), XVideos, Pornhub)

“As men that have had to live life with the impending fear of CSAM that depicts us being found and spread by those in our community, we know how devastating this is to a person that has to live with it. Even worse, we also know that the ability to stop the swell of our media from spreading to every corner of the globe has existed for many years now. Was the pain of our initial abuse not enough? Was the memorialization of it for all eternity on the world wide web not enough? All that we could have become and all that we could have contributed to this world has been taken away. We have suffered enough.

Make no mistake, this is the fight of our times. The task to combat this terrible social epidemic that plagues our world has fallen to us, here and now. We are willing to do our part. Even through the adversities we face on a daily basis, we will fight.

Will you?”

— The Chicago males

Category 2: Availability of CSAM-specific options for reporting a user



No option to report a user for sharing CSAM from user name or profile page	Can report a user but no reporting categories available	Can report a user: Categories include nudity, sexual activity, or pornography but no way to indicate a child is involved	Can report a user and flag that a child is involved, but no option to report the user for sharing CSAM	 BETTER PRACTICE: Ability to report a user for sharing images or videos of child sexual abuse or exploitation
Twitter Discord Facebook Google Hangouts YouTube (mobile)	WhatsApp	Snapchat Facebook Messenger	XVideos Pornhub Instagram YouTube (desktop) TikTok	Skype

Not applicable: Google Search, Bing

Other reporting challenges:

- Use of end-to-end encryption can limit a platform's ability to act on report (WhatsApp)
- Difficult to locate report forms specific to CSAM (when individuals cannot report directly from user name or profile page) (Twitter)
- Cannot report a server⁶ (Discord)
- Once a user is reported, chats with them are then deleted, which means the reporting person would be unable to forward the chat to police (WhatsApp, Skype)
- Difficult to locate how to report a user from their profile page (YouTube (desktop))

Positive reporting functions:

- Text box provided to allow additional context when reporting directly from user name or profile page (TikTok (mobile), YouTube (desktop))
- Ability to report a group (Facebook)

⁶ A **server** is an invite-only, user-generated community around a specific topic where individuals can interact via chat messages, videos, images, text, or voice.

Category 3: Availability of CSAM-specific reporting options for images or videos received in a direct message (DM) or chat



<p>No option to report an image or video as CSAM directly from DM</p>	<p>Can report images or videos from DM but only under broad reporting categories</p>	<p>Can report images or videos from DM: Categories include nudity, sexual activity, or pornography but no way to indicate a child is involved</p>	<p>Can report images or video from DM: Ability to flag a child is involved, but cannot report as CSAM</p>	<p>BETTER PRACTICE: Ability to report child sexual abuse or exploitation</p>
<p>Twitter WhatsApp Discord (desktop) Google Hangouts XVideos Facebook Messenger</p>	<p>Discord (mobile)</p>	<p>Instagram</p>	<p>Snapchat TikTok (mobile)</p>	<p>Skype</p>

Not applicable: Google Search, Pornhub, Facebook, YouTube, TikTok (desktop), Bing

Other reporting challenges:

- Cannot report an image sent in a DM in the child sexual exploitation report form. The URL generated from the image will not be accepted within such report form (Twitter)
- Can send images in a chat where the image disappears after being viewed, which means the image then cannot be reported (Snapchat, Instagram’s **View Once** option)
- While an image that is created while using the app can be reported, an image that was uploaded from the camera roll on the sender’s device and then sent in a DM cannot be reported (Snapchat)

Category 4: Availability of CSAM-specific reporting options for publicly-visible content while not logged into a platform



No option to report visible content when not logged in	No option to report from post or user name or profile, can only use report form	Can report some features but not all	★ BETTER PRACTICE: Can report BOTH visible posts and users when not logged in	★ BETTER PRACTICE: Ability to report visible posts and users as sharing images or videos of child sexual abuse or exploitation when not logged in
Facebook YouTube (desktop) Google Search	Twitter Discord (desktop) Instagram	XVideos (videos can be reported, not users) Pornhub (users can be reported, not videos) YouTube (mobile — videos can be reported, not users)	TikTok	Bing

Not applicable: WhatsApp, Google Hangouts, Discord (mobile), Snapchat, Facebook Messenger, Skype

Other reporting challenges:

- The Help Centre tells those without an account to find a friend who does have an account to report on their behalf (Facebook)
- Individuals do not have to be logged in to view content, but as in Category 1, they are directed to report CSAM to the hotline in their country, where applicable (Google Search)
- An email address must be provided in order to submit the report form (Instagram, Twitter, Discord (desktop))

Positive reporting functions:

- In addition to reporting directly from video or user profile, individuals are able to report through report form when not logged in (Pornhub, XVideos)

Platform-specific findings

The following sub-sections provide details on the assessment of each platform in this report based on research by C3P analysts. A fully-annotated analysis for each platform, which forms the basis of each assessment is available at proctectchildren.ca.

Reporting on Twitter

Reporting issues on Twitter

- It is extremely difficult to report content as CSAM on Twitter.
 - You cannot report content as CSAM through the easily-accessible report function on each Tweet. The same challenges exist for reporting a user for sharing CSAM; you must first locate the **child sexual exploitation report form**.
 - A link to the child sexual exploitation report form is located on a separate page that you have to find by first clicking the small text **Learn more** at the bottom of each report menu, then scrolling through paragraphs of text to locate the link to the report form, which has some outdated information. For example, the child sexual exploitation report form still makes reference to Vine⁷, which has been discontinued.
 - You **must** provide an email address in order for the child sexual exploitation report to be submitted.
 - You cannot report an image or video sent within a DM on Twitter as CSAM. The **child sexual exploitation report form** will not accept the URL from an image within a DM.
- While you can view Tweets when you are not logged in, you cannot report a user or a Tweet unless you are logged in.

Positive reporting functions

- The **child sexual exploitation report form** includes the option to provide context in a text box.

⁷ Twitter announced the discontinuation of Vine in October 2016. It existed in different forms, including Vine Camera and Vine Archive, (but would still have been created in an app and then posted to Twitter, so still would have been seen only on Twitter by January 2017). The Twitter Help Center notes that as of 2019, the Vine archive no longer is available: <https://help.twitter.com/en/using-twitter/vine-faqs>

Reporting on Facebook platforms

(Facebook, Messenger, Instagram, WhatsApp)

I. Facebook and Facebook Messenger

Reporting issues on Facebook, including Facebook Messenger

- There is no way to report a user for sharing CSAM, you can only report posts.
- There are no CSAM-specific reporting options. You can report a post for **Nudity** and then have the option to flag **Involves a child**. However, there is no option to provide additional context; once you select **Involves a child** the report is automatically submitted.
- Depending on a user's privacy settings, you can view certain posts and basic user profiles without logging in, but you cannot report posts for containing or users for sharing CSAM without logging in. Instead, the Facebook Help Centre suggests you find a friend with an account to report it for you.
- On Facebook Messenger (the chat function of Facebook), there is no CSAM-specific reporting option for images and videos, but you can report a user.
- The report function in Facebook Messenger is less intuitive than any reporting function on the Facebook platform. When you report a user, you can select **Nudity** but the option to include **Involves a child** does not appear on Facebook Messenger as it does on some of Facebook features such as posts.

Positive reporting functions

- Private and public Facebook groups can be reported.

II. Instagram

(owned by Facebook)

Reporting issues on Instagram

- There are no CSAM-specific reporting options. You can report a post, story, and user on Instagram for **Nudity or sexual activity** and then select **Involves a child**.
- There is no **Involves a child** option when you report images in a DM.
- There is an option to send images in a DM under the **View Once** category, which means the image cannot be seen again or reported.
- In order to report content when you are not logged in, you must use Instagram's **Report Violations of Our Community Guidelines** form, which requires you to provide your name and email address. The form also asks if you know the person in real life and, "If so, please provide as much contact information for this person as possible." There is no indication as to how this information will be used by Instagram.

Positive reporting functions

- The **Report Violations of Our Community Guidelines** form includes the option to provide context in a text box.

III. Reporting on WhatsApp

(owned by Facebook)

Reporting issues on WhatsApp

- Because WhatsApp uses end-to-end encryption, reporting functions are the most minimal of any of the platforms reviewed here. As stated at the top of each message thread:

 Messages and calls are end-to-end encrypted. No one outside of this chat, not even WhatsApp, can read or listen to them. Tap to learn more.

- Additionally, on the **Staying safe on WhatsApp** page, the platform states: “We encourage you to report problematic content to us. Please keep in mind that to help ensure the safety, confidentiality and security of your messages, we generally don’t have the contents of messages available to us, which limits our ability to verify the report and take action.”
- When submitting a report about a user, there are no categories to select or options to provide context to the reason for reporting. There is no way to report images or videos sent within a DM at all.
- If you select **Block contact and delete this chat’s messages** when reporting a user, the messages are deleted, which means you would be unable to take the report to police if you wanted to.



End-to-End Encryption

In this review, WhatsApp is the only platform that is set up to use end-to-end encryption across their service.⁸ Reporting functions on WhatsApp do not allow users to provide any context whatsoever and it is unclear if the platform is able to act on reports received. The app states, “We encourage you to report problematic content to us. Please keep in mind that to help ensure the safety, confidentiality and security of your messages, we generally don’t have the contents of messages available to us, which limits our ability to verify the report and take action.”

As more platforms explore moving in this direction, the impact of these limitations on the protection of children and survivors cannot be overstated.

⁸ Users are able to turn on end-to-end encryption when using Facebook Messenger’s Secret Conversations option.



Reporting on Google platforms

(YouTube, Google Search, Google Hangouts)

I. YouTube

(owned by Google)

Reporting issues on YouTube

- Reporting on mobile is not as comprehensive as on desktop:
 - On YouTube mobile, you cannot report a user. You can only report a user from desktop, and this is difficult to find, as you must locate the flag icon under the **About** section on a users' channel.
 - On desktop, you have the option to report **Sexual content** and then select **Content involving minors**; on mobile you do not have the option to select **Content involving minors**
- You need to be logged in to report a video (desktop).

Positive reporting functions

- Reporting videos on YouTube is straightforward and you have the option to provide additional context in a text box when reporting a user or video (desktop).
- You can report a video on YouTube without being logged in (mobile).

II. Google Search

Reporting issues on Google Search

- There are no CSAM-specific reporting options for images or videos from a Google Search results page. From the Help Centre, you are directed to report to NCMEC or other agencies listed by continent.

III. Google Hangouts

Reporting issues on Google Hangouts

- There are no CSAM-specific reporting options for images or videos received in a chat. You can only **Block & report** a user without context and the process is complete. On mobile, you cannot report, only block a user.

Reporting on Snapchat

Reporting issues on Snapchat

- There are no CSAM-specific reporting options for Snaps or stories. You can only report **Nudity or sexual content**; there is no option to flag the involvement of a child in the reporting categories.
- There are no CSAM-specific options for reporting a user.
- You are unable to report an image sent within the chat function if the image has been uploaded from the sender's camera roll (versus being taken directly through the app).
- Images in chats can disappear. Once images have disappeared, they cannot be reported.

Positive reporting functions

- When reporting a Snap from the For You section, there is an option to add context in a text box.



Reporting on Microsoft platforms

(Bing, Skype)

I. Bing

(owned by Microsoft)

Better practices: Reporting on Bing

- Reporting an image from a Bing Search is straightforward.
- **This was the only place the category child sexual abuse was offered as a reporting option on all the platforms and services assessed in this document.**
- You do not have to be logged in to report content as CSAM from within Bing Search

II. Skype

(owned by Microsoft)

Reporting issues on Skype

- Reporting an image sent in a chat on Skype is straightforward; however, locating where to report a user is difficult. It is not visible until you click on the user's name, scroll down through an extensive menu, and click **Block contact**. There's no way to know before clicking **Block contact** that this will lead to the reporting function.
- Once a user has been reported, the chat is deleted, which means you would be unable to take the report to police if you wanted to.

Better practice

- When reporting a user, or image or video sent in a Skype chat, you have the option to select **Child endangerment (exploitation)** as a reporting category.



Reporting on TikTok

Reporting issues on TikTok

- There are no CSAM-specific reporting options for videos.
- There are no CSAM-specific options for reporting a user.
- On desktop there is no option to add context to a report with a text box or ability to upload photos, as there is on mobile.

Positive reporting functions

- On mobile, you can add context to the reason you are reporting in a text box and upload up to four photos.

Better practice

- You can report videos on both desktop and mobile on TikTok when you are not logged in.



Reporting on Discord

Reporting issues on Discord

- Reporting on Discord is entirely different between mobile and desktop.
- On desktop, you must first find the reporting form, which is not linked from posts or users' profile pages:
 - You can either search and locate the form through a roundabout process by following a link to the **How to Properly Report Issues to Trust & Safety** page and finding the link to the form there, or you must know to select **Submit a Request** on the **Help Center** main page and to select **Trust & Safety** from the drop-down menu to access the report form.
 - You must then locate the message links to copy to the report form. The form itself is inconsistent about the information it asks for depending on the category you choose to report under.
 - You must provide an email address in order to submit the report.
- You cannot report a user from desktop or mobile.
- There is no option to report a server on desktop or mobile.
- You can report a post on desktop without being logged in by following the steps outlined above (you cannot access Discord mobile unless you are logged in).

Positive reporting functions

- On mobile the process is straightforward and can be done directly from the content you are reporting.

Better practice

- Discord's report form allows you to select **Distribution of child pornography** as a Trust & Safety issue.



A stylized white icon of a person with arms and legs outstretched, centered within a circular frame. The background of the page is a dark red color with a subtle pattern of overlapping circles and lines.

Reporting on Pornhub

Reporting issues on Pornhub

- While the reporting process on Pornhub is straightforward for reporting videos and images, there is no CSAM-specific reporting option. The most relevant category to report CSAM under is **Potentially features a Minor**.
- When reporting a user, the most relevant category you can report under is **Underage**.
- You must provide an email in order to submit the **Content Removal Request** form, which is where you are directed to report CSAM on the **Reporting Abuse and Violations** page.
- While you can access videos and images without being logged in to Pornhub, you cannot report directly from the video or image.

Positive reporting functions

- When reporting a user, there is an option to provide context as to why you are reporting in a text box.

Better practices

- You can report a user without being logged in.



Reporting on XVideos

Reporting issues on XVideos

- You cannot report images (users can upload to their profile pages) or images and videos sent within a chat.
- There are no CSAM-specific reporting options for videos. The most relevant category for reporting CSAM in a video is **Underage**.
- The **Abuse Reporting Form** requires the reporting person to provide their name, email, address, postal code, city, country, and phone number, as well as a dated electronic signature. These fields must be completed in order to submit the report. You are also required check a text box that states, “I swear under penalty of perjury that the information in this notification is accurate and that, to the extent my report involves the alleged violation of a legal right, I am the owner of such a right or authorized to act on the owner’s behalf.”
- You cannot report a user unless you are logged in.

Positive reporting functions

- You can add context to the reason you are reporting in a text box.

Better practice

- You can report videos without being logged in.

Recommendations

Moderation on platforms that allow user-generated content continues to be a challenge for technology companies since it requires significant resources. With improvements to content reporting designs, this community of users can become an effective tool in combatting the propagation of CSAM on these web platforms.

In light of the many content-reporting challenges identified by victims and members of the public, and considering the examination of the various platforms in this report, C3P has developed five recommendations that are pertinent to any web platform that allows user-generated content on their services:

- 1. Create reporting categories specific to child sexual abuse material**

With the exception of Microsoft's Bing search engine, none of the platforms highlighted in this report provide reporting functions specific to child sexual abuse material. Providing users with CSAM-specific reporting options should enable the prioritization for assessment and removal. Limiting the time these illegal images and videos are available helps reduce the re-victimization of survivors and minimize other's exposure.

- 2. Include CSAM-specific reporting options in easy-to-locate reporting menus**

Avoid creating alternative reporting channels for CSAM. This category should be included alongside other commonly reportable violations that are already accessible and easy to find. The process for reporting copyright infringement should not be more intuitive or easier to complete than reporting an image of a child being sexually abused.

- 3. Ensure reporting functions are consistent across entire platform**

Throughout this review several inconsistencies in the reporting tools were observed. The process and steps taken to report CSAM on a platform should be identical whether on desktop or mobile, reporting a post or a user, or if the content is contained within direct message or publicly visible.

- 4. Allow reporting of content that is visible without creating or logging into an account**

Many of the platforms examined in this report allow members of the public without an account or users not logged in to continue viewing media. If content is visible under these circumstances, submitting a report should not require account creation or login.

- 5. Eliminate mandatory personal information fields in content reporting forms**

All of the reporting forms reviewed in this report required users wishing to report content to provide, at minimum, their name and personal email address. One platform requires users provide their full home mailing address, phone number, as well as a dated electronic signature. Such reporting structures discourage users from reporting content and may be a barrier to reporting CSAM given its illegal nature.



Conclusion

Research by C3P identified significant gaps in the CSAM-specific reporting mechanisms of several web platforms that create barriers to the effective and swift removal of images and videos of children being sexually abused.

The key finding identified in this report is the lack of clear reporting options specific to CSAM. Without the ability to explicitly flag images or videos as CSAM, companies limit their capacity to remove offending content quickly. The consequences of inadequate reporting functions and CSAM remaining online are repeatedly echoed in the feedback received by survivors of child sexual abuse and concerned members of the public.

The *Voluntary Principles* have established a standard against which the signatories of the principles and the technology industry as a whole can gauge their activities as it relates to the overarching goal of reducing harm to children. However, based on feedback from victims and the research contained in this report, most of the reporting mechanisms are currently inconsistent with this objective.

In an effort to improve upon this situation, C3P developed five recommendations for the companies assessed in this review, and for others that allow user-generated content on their services:

1. Create reporting categories specific to child sexual abuse material
2. Include CSAM-specific reporting options in easy-to-locate reporting menus
3. Ensure reporting functions are consistent across entire platform
4. Allow reporting of content that is visible without creating or logging into an account
5. Eliminate mandatory personal information fields in content reporting forms

Technology companies are uniquely positioned to take proactive steps to break the cycle of abuse and ensure proper measures are taken to eliminate the dissemination of this illegal content. From a reporting standpoint, many of these measures amount to simple adjustments to website navigation and menu options.

All areas of society have some form of legal or moral obligation to take reasonable measures to protect children. Those behind these internet platforms share that responsibility.

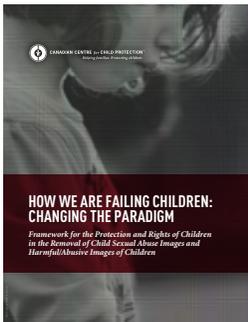


“I was a victim, but now a survivor of child sexual abuse and sexual abuse imagery that has traveled the world via the internet. Abuse that began when I was an infant until I was 4 years old. I was abused by my ex-father and one of his friends. The imagery of me is still being shared on the internet. To date, I have received over 35,000 notifications from the U.S. DOJ regarding those who are in receipt of my abusive images. It’s not fair. No child should have to endure the pain, the hardships, the loss of innocence or a normal life because of the hands of an abuser and those who take pleasure from the suffering of children.”

— Survivor of child sexual abuse material

Additional Research and Reports

This report focuses on only a small portion of how the global epidemic of CSAM is not being addressed properly in order to protect children and support survivors. C3P has released additional reports and research that help build a better picture of the urgent need to have these horrific images and videos removed swiftly, and its effect on survivors when it's allowed to remain online.

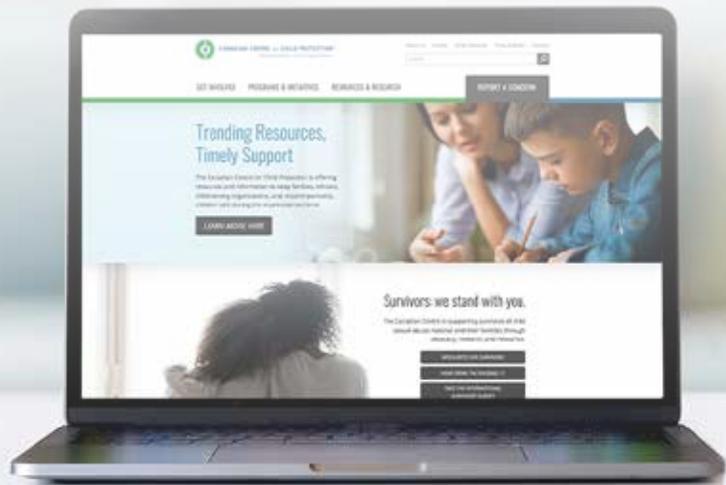


How We Are Failing Children: Changing the Paradigm raises critical awareness about the ways industry has failed to effectively respond to the removal of CSAM online, along with proposing principles of action to put the protection and rights of children at the forefront.



To better understand the unique challenges faced by survivors, C3P launched the ***International Survivors' Survey***. Over the course of a year and a half, 150 survivors from around the world completed the comprehensive survey, contributing valuable details and information about their experience.

Visit protectchildren.ca to learn more.





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