



***First assessment of self-declarations made under the
EU safer social networking principles***

Comments from Yahoo!

Introduction

Yahoo! is pleased to support the EU principles on safer social networking which were agreed in 2009. We welcome this opportunity to comment on the first assessment of Yahoo! services.

About Yahoo!

Yahoo! operates a broad range of services in the EU. These include search, communications services, entertainment services and community-based services where users may post and share content and establish connections with other users. These services do not fit the mould of a typical social networking service but we have, nonetheless, taken the opportunity to contribute to the development of the principles. In doing so, we have made a commitment to make a self-declaration on two services – Flickr and Yahoo! Answers. We use these principles, among other things, to guide our own processes for determining what safety measures are appropriate for our customers.

Our approach to online safety takes several forms. This reflects the breadth and interconnectedness of the many Yahoo! products and services. This includes developing technical safety features as a core part of our product development process, providing safety information in our products and in a central location ("Help Central") where users can find guidance on all Yahoo! products and services and providing users with details of where they can obtain specialist information and advice about specific issues. Together, these activities reflect our strong commitment to safeguarding user safety and privacy and the fact that the advice we offer users is applicable to a broad range of Yahoo! products and services (i.e.: wider than social networking-like services).

The principles

The EU has shown strong leadership in promoting new approaches to online safety and we welcome the European Commission's commitment to exploring novel and innovative ideas in partnership with industry based on the principles of self-regulation. The objective behind the safer social networking principles is an important one. It aims to build on national initiatives and promote good practice across all EU markets with a view to ensuring widespread awareness of online safety, as well as a consistent policy which reflects the fact that the EU is a single market.

Yahoo! welcomes the intention to give the public and other interested parties greater transparency about how providers have applied the principles. This exercise has given us an opportunity to test the methodology chosen by the Commission and to consider how the results contribute to the overall objective. We believe there are some valuable lessons to learn from this process and room to refine the methodology and approach accordingly. We look forward to discussing these with the Commission in the coming months.

Comments on the final Yahoo! report

The purpose of the review was to give the public reassurance by verifying the statements each provider made in their respective self-declarations. The assessment of Yahoo! services has

concluded that one of our products, Flickr, does not fully reflect the self-declaration with respect to two of the principles. This conclusion is the result of a misunderstanding of how Yahoo! provides safety information to its customers (i.e.: not only in individual products but also via Help Central where the guidance is relevant to more than one product, as noted above) and some confusion arising from the fact that Yahoo!'s self-declaration covered more than one product. We believe that any confusion about how statements in our self-declaration applied to individual services should have been addressed before or during the assessment and, had we had this opportunity, we would have been pleased to do so.

We also note that the assessment reached conclusions about compliance of our services with the principles. The methodology chosen by the Commission focused only on reassuring the public that the self-declarations were a true reflection of the safety features in the products declared by each provider. It was not a compliance exercise, the premise being that it is a matter for providers to assess how the principles apply to their product(s). It is disappointing, therefore, that the review departed from the methodology in this way and that comments on this matter appear in the final report. In the case of Yahoo!, these conclusions were positive. However, the experience may affect providers' confidence in the process.

Concluding comments

Yahoo!'s approach to online safety is subject to periodic reviews and improvements. Along with feedback from our users and other parties, this review exercise will contribute to our internal discussions.

We hope that the considerations we raise here will inform future reviews and we look forward to continue working with the Commission and our industry colleagues on this area of policy.