

**Implementation of the Safer Social Networking Principles for the EU:  
Testing of 20 Social Networks in Europe  
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## **FACEBOOK**

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### **Introduction**

Facebook is a service that connects people with friends and others who work, study and live around them. People use Facebook to keep up with friends, to share links, to share photos and videos of themselves and their friends. The minimum age required to join Facebook is 13. Users can add friends and send them messages, and update their personal profiles to notify friends about themselves. Additionally, users can join networks organized by city, workplace, school, and region.

The following is a report based on the testing of social networking service Facebook. The main English version was tested.

### **Summary of findings:**

- Safety information is available to all, also those not signed up.
- The safety information is targeted to parents, but not to teens and teachers.
- Parental control tools are very limited.
- Report mechanisms are partially efficient as they are not visible at all times.
- Users are provided with various tools to control their privacy settings.
- Minors are not searchable through search engines.
- Applications (3rd party, external or additional programs and/or services) need permission from
- the users to be installed and/or pull info from user's profile.

#### *Principle 1 "Raise Awareness"*

##### *In the Self-Declaration:*

The self-declaration does not include information neither on Terms of use nor on privacy. The information on safety is modest, focusing on the accessibility through the links and special search term results to allow easy navigation to safety principles.

Safety information is stated to be targeted towards specific user groups, declaring that Facebook has participated in educational efforts "for each of these groups" (where it is assumed that the provider refers to the groups listed in the Principle 1: users, parents, teachers and carers). It does not mention children. The provider does not specify whether the information is presented in a prominent way and a practical format nor whether it is easy understandable.

The self-declaration does not state that the safety information provides guidance regarding inappropriate content and conduct and information on the consequences of breaching the Terms of Service.

Moreover, it is not stated that the service includes information on links to educational material and technical controls for parents. Despite not addressing this issue and not mentioning parents explicitly the provider states that they have participated in educational efforts for parents and teachers. Further the provider mentions the participation in “Teach Today”, an industry consortium working with stakeholders throughout the EU to provide material for teachers about internet safety.

*On the site:*

In **Facebook** both the Terms of use and the Privacy Policy are very easily found on the site. It is also easy to find the Safety Policy and safety tips/information for parents as well as links to educational material or organizations active in child safety. Safety tips/information to parents is in general sufficiently easy to understand and to access.

Safety tips/information for children and teachers could not be found, apart from recommendation that the minors aged 13 or older should consult parents for permission before sending any information about themselves to anyone over the Internet.

The provided information is in textual format. Information on safety settings of the user’s profile is briefly addressed (just stating that one can have control over it). External links to professional safety organizations and authorities are provided.

The Terms of use clearly list content and conduct that are not allowed, as well as the minimum age requirements (age 13). Further, the consequences of engagement in prohibited behavior are also listed.

In general, information on specific risks is not found apart from information on seeing an objectionable photo (does not mention what kind), hate speech and bullying. The information on bullying as well as how to report or respond is sufficient.

*Principle 2”Ensuring Age Appropriate Services”*

*In the Self-Declaration:*

The self-declaration does not outline how it is made clear to users when services are not appropriate for children and young people neither how it is made clear to users where a minimum age applies. But it does outline the steps taken to deny access (the users are required to provide birth data), delete under-aged users (the analysis of friend connections by age) or to prevent under-aged users to attempt re-registering with a different account. They use cookies to make re-registration difficult once a user has given a birthdates indicating they are under 13.

Further, the provider mentions built-in tools for users of Pages and Applications that allow restriction of content provided through these channels to certain age groups. The provider also outlines other means they have employed to limiting exposure to potentially inappropriate *content* (special restrictions on advertising targeted to minors).

The provider does not address in the self-declaration how uptake of parental controls is promoted on the service.

*On the site:*

When signing up to the Facebook, no age verification is needed, meaning one does not have explicitly state (or tick a statement) that the user signing up is above certain age. However, the service requires you to list your year of birth (but not the date). Also, email verification is

needed. The attempt to sign up as a 11-years old failed. One is prevented from re-registering by use of a cookie. Once the cookie was removed, the sign up as a 15-years old was successful.

On Facebook, no parental control tools can be found. In the Facebook safety section, the provider explicitly states that it is generally forbidden by privacy laws to give unauthorized access to someone who is not an account holder. However, if parents believe their under-13 old child has created an account, they can request Facebook to permanently delete such account.

### *Principle 3 "Empower users through tools and technology"*

#### *In the Self-Declaration:*

The provider does not indicate in the self-declaration any employment of tools and technologies to assist children and young people in managing their experience on their service. The mention that Facebook provides users with extensive controls around their profiles and content and with setting reasonable defaults for minors, mentioning the restrictions of creation of public search listings and the possibility for users to choose who can access their information and who not. However, the provider does not address any further details.

#### *On the site*

The information on how to report abuse or bullying, how to block other users from contacting you and on the possibility to specify who or which groups of users that could contact you can easily be found on the site.

Once signed into the profile, the user is able to delete/remove posting and photos on their profile as well as those they put on other profiles.

Other users cannot post comments on the profile as only users' friends have this possibility. Also, personal information (the one user decides to share) is not visible to other users but only to friends. The default setting for personal information is to be visible only to friends for all users (set to private as opposed to public). The user also has the possibility between choosing online or offline status when signed into Facebook. However, there is no possibility to be invisible (which means that one is able to see other users but other users are not able to see them). The user is also notified when tagged in a photo by friends but does not have a chance to approve the photo before being published. However, one can remove a tag once the photo is published and has been notified of being tagged. Also, there are privacy controls for 'photos tagged of me', which a user can set to reduce the visibility of who can see a tag.

Safety tips and/or guidance about publishing personal information or a photo on the profile is not provided.

In case of attempt to delete the profile, information can be found in the Privacy Policy page.

There is also a clear link provided in the account-setting page that enables deactivation. On the site, only a link for deactivating a profile is provided. However, if user would like their account permanently deleted with no option for recovery, one has to submit a request to Facebook<sup>1</sup>. The provider does not state any information about what personal information the SNS collects/retains after deleting/deactivating my profile or how it is used.

The under age users can search for users their own age (17 and below) and are not searchable through search engines such as Google. Interestingly, when trying to search for a 13 years

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<sup>1</sup> To get to this information, one has to go to settings, and click on help. Then one has to search for "delete account" and as a result a list of FAQs is displayed. One can then click on the FAQ "I want to permanently delete my account. How do I delete my account?" and the above procedure is described there.

old, it was searchable through Facebook both through adult and minor account whereas the 15 years old was not found in either case.

*Principle 4 "Provide easy-to-use mechanisms to report violations"*

*In the Self-Declaration:*

Facebook provides contextual reporting links on content throughout the site and has led in setting service levels around response times for reporting nudity, pornography, and inappropriate contacts directed to minors.

However, it does not say whether the mechanism is understandable to all users, and that reports are acted upon quickly.

The declaration does not indicate that the reporting procedure is age appropriate or that reports are acknowledged, or that the users are given indications on how such reports are typically handled.

*On the site:*

When signed into Facebook profile, a link for reporting other users is not visible at all times, as one can only report users who are not one's friends (the link to report/block non-friends always appears under the basic version of their profile) No link is provided to report friends or block them, as only a link to remove a friend is provided. Therefore, one cannot report friends' profiles or messages, but one can report their photos, videos, and notes. Once a friend has been removed, and becomes just one of other users, that friend can also be easily reported or blocked. However, one can go to "settings" and then click on the "block list" and search for a person one wishes to add on a block list. That person can also be a friend. If a friend is added to the block list, then it is immediately removed from friends. Also, one can decline a friend's request.

The information on how to report a friend is not directly found. The link/tool where one can report abuse/violation of terms is also not provided or visible at all times.

As stated above, one can only report photos, videos and notes but not other content (e.g. wall posts or comments). The button to report photos is easily found below photo.

The report mechanisms are in general easy to understand (one just has to click on the link and gets further information on what the reports is being about).

When the report is sent, one immediately receives the message: "An administrator will review your request and take appropriate action. Please note that you will not receive a notification about any action taken as a result of this report. We apologise for any inconvenience this may cause."

After sending a test report, one only receives the above message but as indicated in the message above, one does not receive a notification about any actions taken as a result of the report.

*Principle 5 "Respond to notifications of illegal content or conduct"*

*In the Self-Declaration:*

The provider states they have integrated a real-time blocking and reporting system based on NCMEC's list of known internet URLs hosting child pornography and deployed multiple systems to detect and respond to anomalous behaviour on the site. The provider also states they work with law enforcement and affiliated agencies, including NCMEC. However they do not provide any details on how they link with law enforcement and affiliated agencies.

*On the site:*

The reporting mechanism was not tested for illegal content or contact.

*Principle 6 "Encourage users to safe use of personal info and privacy"*

*In the Self-Declaration:*

Regarding enabling and encouraging users to employ a safe approach to personal information and privacy, the provider states they seek to assure that the users understand the site’s powerful privacy setting (not providing any details) and that they conduct regular education campaigns to assure that users are aware of potential risk information sharing and knowledgeable about the extensive privacy settings available on the site.

*On the site:*

On Facebook it is quite easy to change one's privacy settings. At the registration, the user is asked to age, email, gender and real first and last name. Optional, user is asked to provide school or workplace information and a photo. A range of other information can be provided once registered by the user if wished so (political views, religion, relationship status, interests etc.).

From the provided information at the registration, the age, real name, gender and email are automatically inserted into the profile. Other information is inserted once the user provides it (if decides so).

Also, applications (3rd party, external or additional programs and/or services) need permission from the users to be installed and/or pull info from user's profile.

*Principle 7 "Assess means for reviewing illegal or prohibited content/conduct"*

*In the Self-Declaration:*

The provider mentions that they are regularly assessing ways to optimize their systems to detect and remove inappropriate content and conduct, engaging in discussions with government and other stakeholders to ensure constant improvement. They do not provide any other information on this in self-declaration.

*On the site:* This principle is not tested on the site.

## Summary of results

### Assessment of the Principles vs. the Self-declaration

Principle	Compliant	Partially Compliant	Not Compliant	Not Applicable	Comments/ Clarification
1		x			
2		x			
3		x			
4		x			
5		x			
6		x			
7		x			

### Assessment of the Self-declaration vs. the measures implemented on the SNS

Principle	Compliant	Partially Compliant	Not Compliant	Not Applicable	Comments/ Clarification
1	x				
2	x				
3		x			
4		x			
5	<b>Not Tested</b>				

6  
7

x  
*Not Tested*

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