

# FACEBOOK

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## Introduction

Facebook is an online community where members can find and communicate with others as well as browse and share user-generated content. Users interact with friends' profiles, send messages to other users, join groups, become fans of pages, use third party applications and games, and upload and share photos and videos. Users must be 13 or older to use Facebook. Users can communicate synchronously with other users using the Facebook chat application.

Facebook was founded in 2004. It operates globally and in many different languages. Facebook is the most used social networking site in the world. According to Facebook there are more than 500 million active users and 50% of the active users log on to the site on any given day.

The following is a report of findings of the analysis of the self-declaration provided by Facebook and the testing of its website. Facebook was tested in Ireland (English version) and in France (French version) in December 2010 - January 2011.

## Summary of main findings

The self-declaration provided by Facebook is overall in-line with the Safer Social Networking Principles. The implementation of its self-declaration in the website is rather satisfactory in both the English and the French versions of the site tested. In both language versions users may report photos, messages or persons, using the report abuse link, prominently displayed on most content modules on the site. Even though the available Reporting mechanisms are easy to use, the testing in both the English and the French versions of Facebook revealed that Facebook does not react expeditiously to user's reports of inappropriate content/contact.

In terms of users' privacy, both versions of Facebook require users to provide only basic information about them during registration. Once registered, users may enter additional personal information. The tests in both versions of the site confirmed what is stated in the self-declaration, namely, that the profiles of minors are accessible not only by contacts in the users' contact's list, but also by other Facebook users such as "friends of friends" and networks. Thus, one can conclude that profiles of minors are not set to "private by default"<sup>1</sup> as defined in the Safer Social Networking Principles<sup>2</sup>. However, Facebook suggests "Recommended Privacy Setting" for minors where mobile phone number, home address, and email address are restricted only to friends. The "Recommended Privacy Settings" are implemented by default when minors set-up a profile.

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<sup>1</sup> "Ensuring that setting a profile to private means that the full profile cannot be viewed or the user contacted except by 'friends' on their contact list" [http://ec.europa.eu/information\\_society/activities/social\\_networking/docs/sn\\_principles.pdf](http://ec.europa.eu/information_society/activities/social_networking/docs/sn_principles.pdf)

<sup>2</sup> For a full description of each of the Safer Social Networking Principles, please consult: [http://ec.europa.eu/information\\_society/activities/social\\_networking/docs/sn\\_principles.pdf](http://ec.europa.eu/information_society/activities/social_networking/docs/sn_principles.pdf)

When signed in to Facebook as minor, some of the adverts displayed on the profile could be considered as inappropriate.

In both versions, Facebook provides targeted, easy-to-understand safety information for parents, teachers and teens through the Help Centre available on the footer of all pages. The footer also contains relevant links to the Privacy Centre and the Terms of Service. However, more links to external web sites, resources or organizations are available in English than in French.

## **Analysis of Results by Principle**

*Principle 1: Raise awareness of safety education messages and acceptable use policies to users, parents, teachers and carers in a prominent, clear and age-appropriate manner*

### *Main findings in relation to the self-declaration*

In its self-declaration Facebook states that they provide guidance, information and educational materials specifically targeted to children and young people on how to navigate their website safely through their Safety and Security pages. Additionally, Facebook claims it provides on every page a link to the “Statement of Rights and Responsibilities” of users. These Terms have been simplified in the “Community Standards” so that they are easy-to-understand for users of any age.

The self-declaration neither provides explicit information on what constitutes inappropriate behaviour on the site nor information on the actual consequences of breaching the Community Standards. However, it does provide links to relevant information on the Facebook site where this information can be found. The self-declaration does not give any information on if the website offers parents and/or teachers technical controls (e.g. parental filters) that support their involvement in the safer and more responsible internet use of their children, although it does provide general safety information specifically targeted at them.

### *Main findings in relation to the website*

According to the test results and confirming what is stated in the self-declaration, Facebook in Ireland (English version) and in France (French version) provides targeted safety information for parents, teens, educators and law enforcement through the Facebook Safety page linked to directly from the Help Centre available from the footer of all pages. The footer also contains links to the Privacy Centre and the Terms of Service. Step-by-step ‘how to’ instructions are provided in the Help Centre section of the site detailing how to configure all aspects of the Facebook site including how to configure user profile settings. There is some preventive advice for teens on how to be safer on Facebook (e.g. how to report abuse on the site) as well as links to a Guide to Privacy on Facebook, Statement of Rights and Responsibilities, information on reporting abuse and several FAQs. The content for teachers and parents is comprehensive and contains links to information hosted by third-party organizations. The Safety Centre contains advice tailored to teen audiences and links to appropriate external resources. However, it was not possible to find information about the Hotline neither in Ireland nor in France.

In both the English and the French versions of Facebook, the Statement of Rights and Responsibilities outlines what Facebook considers as inappropriate behaviour on the website. The consequences of breaching these terms are included here as well as in the Privacy Help

section. This information is appropriate, especially for adults, but certain parts may be difficult to understand for teenagers especially because of the use of long and complicated sentences.

### *Principle 2: Work towards ensuring that services are age-appropriate for the intended audience*

#### *Main findings in relation to the self-declaration*

In its self-declaration Facebook states that the minimum age requirement is 13 years old. When signing up users are required to provide their date of birth to establish their age. Facebook also mentions that it employs cookies to make re-registration difficult and that it makes use of analysis of friends' connections by age to identify (and eventually correct or delete) profiles of users suspected to have provided a wrong age. Content on Facebook can be age-restricted via "built-in tools" and applications; however, no further specifications are made regarding what these tools are or how they work. Special restrictions are placed on advertising targeted to minors.

Facebook does not make clear when services are not appropriate for children and young people or where a minimum registration age applies. It only provides information on the mechanisms employed to restrict certain types of content to certain age groups such as "inappropriate advertising". Specific information on what is considered as inappropriate content or advertising is provided via a link to the Advertising Guidelines [http://www.facebook.com/ad\\_guidelines.php](http://www.facebook.com/ad_guidelines.php) and the Platform Policies (<http://developers.facebook.com/policy>), however this information is not explicitly mentioned in the self-declaration.

No information is found on the ways in which Facebook promotes the uptake of parental controls to allow parents to manage their children's use of the service.

#### *Main findings in relation to the website*

In both the English and the French versions of Facebook Statement of Rights and Responsibilities, it is clearly stipulated that the minimum age requirement is 13. As mentioned in the self-declaration, both versions of the site show that Facebook relies on self declaration of age by the user in the registration process as the key mechanism for ensuring that only children over 13 can become members of their website. When trying to register as a 9 year-old permission was, indeed, denied and it was not possible to immediately re-register as older from that machine. However, it was possible to immediately re-register once the browser (Firefox in both cases) was closed down and reopened, showing that the cookies had been removed.

Both in the English and the French versions of Facebook, the parental advice in the Safety centre states that it cannot allow parents to monitor or access the accounts of their children but it does encourage parents to engage with their children's activities on the site and provides information and advice to support this process. Furthermore, no parental control devices were found on any of the language versions tested.

When signed in to Facebook as a minor, advertising was displayed on the right-column under the subheading "Sponsored". For instance in the English version, four adverts were displayed; one for fast-food, one for a celebrity gossip blog, one for a competition to win a €500 shopping spree in a local department store, and one for a virtual card game (Blackjack

Extreme). When clicking on the Adverts that appeared to be for a celebrity gossip blog (Rihanna or Fake?), it opened a video chat application called Rounds. This application opened the tester's webcam and prompted the tester to "call a friend or meet someone new". When the option "meet-someone new" was clicked the tester was informed that it was necessary to "have at least 100 friends on Facebook to join a random Round". In the French version one of the ads about a game warned users that the game was "very addictive" and that it had been banned in the US. No ads about alcohol or tobacco adverts were found during the testing in any of the language versions of Facebook tested.

***Principle 3: Empower users through tools and technology***

*Main findings in relation to the self-declaration*

In relation to its self-declaration, Principle 3 has been rather satisfactorily assessed. Facebook refers to several mechanisms to empower users through the use of specific features implemented on its website. For instance, all users can control what individual friends can see or block specific people entirely. From the Account tab on every page users can always access their privacy settings and, supporting information and clear guidance on how to use these settings is provided. Furthermore, Facebook users have "granular control over every piece of content they create". This means that users can share their content on the site with specified users or to delete individual pieces of content at their own will.

In the case of users ages 13-17, they have more restrictive default privacy settings than adults, although they cannot be considered as "*private by default*"<sup>3</sup> because they include "friends", "friends of friends", and "networks" which goes beyond the "user's approved contact list". Other mechanisms worthwhile mentioning are that users ages 13-17 cannot be found by external search engines (e.g. Google) and the geo-location product "Places" which limits the visibility of users younger than 18 to confirmed friends only.

Facebook offers safety information and tips for parents in order to help them protect children and young people, but no information on parental control tools is found anywhere in the self-declaration.

According to its self-declaration, Facebook regularly assesses the mechanisms to detect and remove inappropriate content or contact and its reporting mechanisms are continuously evaluated by senior management and through internal reports on their effectiveness.

*Main findings in relation to the website*

Both language versions tested show that Facebook has taken measures that can help minimise the risk of unwanted or inappropriate contact between children and young people and adults. Although not "*private by default*", profiles of minors were not found by searching for them in search engines such as Google or Bing. In general, adults registered on the site can only find minor users if they know their email address or profile URL. Even then the young user must approve their friendship request before they can see their profile. However, if an adult user is befriended with a minor, the default profile settings of the minor allows all the adult's friends to have access to the minor's profile, except the contact information. Still, it is possible for the adult's friends to send the minor private messages and friends' requests.

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<sup>3</sup> As stated in Principle 3 in the [Safer Social Networking Principles](#).

By default in both language versions tested, not only (adult) users that are accepted as friends are able to access the profile or interact with minors, but also their friends. While there are three general privacy settings that restrict access to all your information to either “friends”, “friends of friends”, or “everyone”, it is possible to create a customised privacy setting by defining access rights to each information element. This is a straight-forward but time-consuming process. It is possible to block other users and report abuse by clicking buttons on the profile, comment, or photo that offends. Users can also delete unwanted content, unwanted comments and restrict access to their profile.

As stated in the analysis of the self-declaration, Facebook does not provide information about available tools to help parents protect their children online. However it does link to third-party sites that provide this kind of advice (although mostly in English), and also provides parents with general safety information (Principle 1).

#### *Principle 4: Provide easy-to-use mechanisms to report conduct or content that violates the Terms of Service*

##### *Main findings in relation to the self-declaration*

Facebook provides abuse reporting buttons to report content or behaviour on almost every page of its site. On every video, picture or comment users have the opportunity to report content. However, the self-declaration does not explicitly mention if this procedure to report inappropriate conduct or content is age-appropriate or easily understandable for younger users. Users can also report unwanted or inappropriate contact or messages from other users and also block other users even if they are not friends.

According to its self-declaration, Facebook has developed sophisticated technology to prioritise and process notifications from users, which area managed by a dedicated team working 24/7. The self-declaration does not mention if these notifications are acted upon expeditiously or if reports are acknowledged. It also does not include any information on if users are provided with the necessary information they need to make an effective report, or if users are provided with an indication of how reports are typically handled.

##### *Main findings in relation to the website*

Once logged into Facebook, the report abuse link is prominently displayed on most content modules in the site. The Safety Centre provides information for teens, parents, and educators on how to use the reporting mechanisms. The easiest method for reporting abuse for Facebook users is to use the "Report" buttons that appear near the content itself (e.g. photos, messages, comments on the wall, etc.). There are also Report abuse forms available for people without a Facebook account, but they can also be employed by users. These report abuse forms are very difficult to find because no links to the forms are provided in the Safety Centre. However by searching for “how do I report abuse with no account” in the Help Centre it was possible to find report abuse forms to report users, photos, abuse in general, etc. In order to submit these forms all entries in all fields must be filled in; however some field labels may be rather difficult to understand especially for younger users (e.g. “URL (web address link) of the violating content” or the “description and steps to reproduce the issue fields”).

During the testing, in both versions of the site a bullying situation was set up where one minor posted a bullying picture and nasty comments on another minor’s profile. In both sites the “bully” posted an offensive photograph with some accompanying nasty comments on the wall

of the victim. The “victim” reported the incident by clicking the “report this photo” button underneath it. This brought a pop-up window with a list of options (e.g. “Nudity or pornography”; “Graphic violence” and “Attacks an individual or group”). The “victim” chose one of these options and received an acknowledgement that the report had been received. The bullied minor got no further communication and the content was not removed from any of the sites tested. The same happened when the “victim” used the “report a message” link to report one of the nasty comments received.

#### *Principle 5: Respond to notifications of illegal content or conduct*

##### *Main findings in relation to the self-declaration*

In its self declaration Facebook indicates that they have developed sophisticated technology to prioritise and process notifications from users, which are managed by a dedicated team 24/7 around the globe, however the service provider does not explicitly mention if these notifications are *expeditiously* reviewed or if offending content is quickly reviewed and, eventually, removed.

Even though Facebook has implemented real-time blocking and reporting systems based on lists on known internet URLs hosting child abuse images (provided by the National Center for Missing and Exploited Children in the U.S. (NCMEC)), the self-declaration does not specify how Facebook deals with other types of offending content.

Facebook has dedicated staff for responding to and working with law-enforcement in Europe. They also provide specific guidance in the Safety Centre for law-enforcement officials.

Because of ethical reasons, Principle 5 was not tested on the website.

#### *Principle 6: Enable and encourage users to employ a safe approach to personal information and privacy*

##### *Main findings in relation to the self-declaration*

Facebook states that minors on Facebook have more restrictive privacy default settings than adults while all users can access a wide range of privacy settings on every page from the Account tab. According to the self-declaration, these settings are accessible at all times ensuring that users are in full control of what they share and with whom.

Through the Privacy Centre, accessible from every page, users can learn about privacy (settings) by means of easy-to-understand explanations and videos that demonstrate how to change one’s privacy options. There is also a Facebook Safety Page for users that provides regular tips and hints on how to stay safe (e.g. anti-bullying messages). Facebook also engages with a number of NGOs to help promote online safety messages.

Facebook neither specifies if they have taken into consideration the implications of automatically uploading information provided by users (during registration) onto their profiles nor if they notify them that this is happening. However, users are allowed to edit and make public/private the information (provided during registration) that is automatically uploaded onto their profiles.

##### *Main findings in relation to the website*

In both language versions of Facebook, the testing revealed that personal information specified by minors during registration is automatically mapped onto their profile (without being explicitly told that this would happen). However, the visibility of such information to other users depends on the privacy settings chosen. By default, in the case of minors, this information is available to friends, friends or friends and networks. Contact details, however, are only available to friends.

In both language versions of the site, Facebook provides a link to the Privacy section which contains both a guide on how to control access to your information on Facebook and videos demonstrating the settings that you can configure. However, when a user creates an account, they are not encouraged to visit the privacy settings page. In both language versions of the website, all the privacy settings are located in the Privacy Settings section. There are three general privacy settings that restrict access to all your information to either “friends”, “friends of friends”, or “everyone”, but, as mentioned in Principle 3, it is possible for users of any age to customise their privacy settings at any time. Facebook also suggests “Recommended Privacy Setting” for minors where mobile phone number, home address, and email address are restricted only to friends. The “Recommended Privacy Settings” are the default settings for minors.

As part of the testing, a fake user account had to be deleted. The test revealed that both in the English and the French versions of the site both deactivating<sup>4</sup> and deleting profiles permanently is possible. Deactivating a profile is quite straightforward and can be done from the “profile” page. Deleting a profile is less easy because it is difficult to find the “Ask for deleting” link.

#### *Principle 7: Assess the means for reviewing illegal or prohibited content/conduct*

##### *Main findings in relation to the self-declaration*

According to its self-declaration, Facebook regularly assesses ways of optimizing its systems to detect and remove inappropriate content and conduct on the site and continuously tries to improve these systems especially to allow users to report conduct or content on the site, as well as to develop automated systems to identify ‘bad’ users or content. Internal reports on the effectiveness of these systems are permanently reviewed by senior management at Facebook to ensure the continuous improvement of such tools.

Facebook liaises with external agencies such as the IWF in the UK or the OCLCTIC in France to support the identification of prohibited content.

Principle 7 was not tested on the website.

#### **Summary of Results and Conclusions**

The testing of Facebook website has demonstrated that Principle 1 has been very satisfactorily implemented on its website while the rest of the Principles have been rather satisfactorily implemented. Areas of attention on Facebook website include:

- Reports of inappropriate content/contact are not answered.

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<sup>4</sup> Deactivating a profile means that the information is no longer visible to users although it remains in Facebook database in case one wants to reactivate the profile later.

- Profiles of minors are not set to “private by default”. This means that profiles of minors can be accessed not only by their friends but also by the friends of their friends and networks.
- Some advertising can be considered as not appropriate for minors.
- The mechanisms to avoid re-registration of underage users are inefficient.
- Lack of information on existing parental control mechanisms, e.g. the benefits of employing filtering software.
- Not all the sections in the Terms of Use are easy for children to understand.
- Lack of concrete information, especially targeted at children, on the consequences of breaching the Terms.

#### Assessment of the Principles in the Self-declaration

<i>Principle</i>	<i>Very satisfactory</i>	<i>Rather Satisfactory</i>	<i>Unsatisfactory</i>
1		x	
2		x	
3		x	
4		x	
5		x	
6		x	
7	x		

#### Implementation of the Self-declaration on the SNS website

<i>Principle</i>	<i>Very satisfactory</i>	<i>Rather satisfactory</i>	<i>Unsatisfactory</i>
1	x		
2		x	
3		x	
4		x	
6		x	

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