

EU SNS Safer Social Networking Principles Self-declaration Form

In the interests of transparency, providers supporting the EU Safer Social Networking Principles agree to self-declare how they have considered the Principles in relation to the Social Networking Services they offer, using the form below.

1. About the Social Networking Service(s)

The following is a brief outline of Yahoo! in Europe, including a short description of the services it offers that fall into the category of “social networking” as outlined in the Principles.

Yahoo! is a leading global internet brand and one of the most trafficked internet destinations worldwide. Headquartered in Sunnyvale, California, and with its European HQ in Switzerland, Yahoo!'s global network includes 25 world properties and is available in 13 languages. Yahoo! provides online products and services, offering a variety of services essential to users' life with 'social networking' features.

This self-declaration relates to Flickr, which allows users to share their digital photos and short videos (max 90s) with other users, comment on their photos, create a profile and participate in forums and groups. Flickr is provided by local Yahoo! companies in Ireland, UK, France, Germany, Italy and Spain. Examples given in this document are drawn from the UK & Ireland service available from the Yahoo! UK & Ireland home page - <http://uk.yahoo.com>

2. How has the company considered these services in relation to the Principles?

The following is an outline of how Yahoo! in Europe has considered the EU Safer Social Networking Principles with respect to Flickr. This section will make reference to the recommendations made in the Principles document, where they are applicable and outline how they are applied.

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

Terms of use and community guidelines

In order to create a Flickr account, a user must first have obtained a Yahoo! ID¹. In doing so, users commit to general terms of service which set out conditions of use for all Yahoo! services, including

¹ Note that users can also create a Flickr account using a Google or Facebook ID but they have to agree with Yahoo! terms of service.

Flickr. They also set out the consequences of a user breaching the terms of service, including withdrawal of their access to a particular service or, in some cases, the deletion of their Yahoo! ID (i.e.: withdrawing access to all Yahoo! services).

In addition, Yahoo! has developed Community Guidelines which set out standards of behaviour for community-based services (see: http://help.yahoo.com/l/uk/yahoo/safety/keeping_safe/guidelines.html). These are supplemented with additional guidelines for Flickr <http://www.flickr.com/guidelines.gne>, explaining the dos and don'ts for users including what could happen if they breach the guidelines. They are widely available via a link in the page footer of every page on Flickr and are written in language that is accessible to all users, including children. They are also referenced in a number of FAQs on Flickr, wherever relevant.

Safety education and messaging

Flickr is one of a number of services Yahoo! offers to its users. Many of these services have similar features and, where safety information is common to several services, we provide it in central locations on the Yahoo! portal (and outside the terms of service) and in local languages:

- Dedicated guidance for parents and carers, including teachers, prominently shown within Yahoo! Help Central. The UK examples can be found at: http://help.yahoo.com/l/uk/yahoo/safety/parents_and_carers/. This is linked from the Help home page.
- Dedicated guidance for children and young users prominently shown within Yahoo! Help Central. The UK example can be found at: http://help.yahoo.com/l/uk/yahoo/safety/young_users/. This is linked from the Help home page.
- Information about direct and indirect support and advice from third party providers specifically targeted at children (e.g.: http://help.yahoo.com/l/uk/yahoo/safety/young_users/useful_resources.html).
- Information about direct and indirect support and advice from third party providers specifically targeted at parents, carers and teachers (e.g.: http://help.yahoo.com/l/uk/yahoo/safety/parents_and_carers/useful_resources.html). This includes materials that support dialogue, trust and involvement between parents and children about responsible use of the internet.
- Specific guidance for users on privacy and the posting of information and content on user generated services in the Yahoo! Privacy Policy (e.g.: <http://info.yahoo.com/privacy/uk/yahoo/>)

Additional information is provided as part of the Flickr service itself (and outside the terms of service):

- Permanent link on all Flickr pages to Flickr's Community Guidelines - <http://www.flickr.com/guidelines.gne>
- Permanent footer and header on all Flickr pages linking to The Help Forum - <http://www.flickr.com/help/forum/en-us/> - where users can post advice on help topics and ask questions of other users. Posts on the Forum are searchable by key word and Flickr staff members monitor the Forum and post when necessary.
- Permanent link on all Flickr pages to FAQs - <http://www.flickr.com/help/faq/>. This is an index of commonly asked questions and answers provided by Flickr staff and includes a range of safety topics such as how to use safe search, how to block users or report abuse and how to apply safety filters to photos.

- Permanent link on all Flickr pages to safety information provided in Flickr FAQs.

Flickr is primarily designed for adult users but all Yahoo! safety information is written in accessible language so that it is understandable by all users, including children.

Community management

Flickr has “community-managers”. These are staff members who engage with the community to promulgate and encourage respect for the standards of behaviour set out in the community guidelines and the Yahoo! Terms of Service. This helps build a community based on shared values and attitudes. It also promotes engagement and encourages users to make quality contributions to their community both in terms of the content they publish and share, and their treatment of others. Community managers also help users by participating in The Help Forum. We encourage members to report abuse if they see anything inappropriate or offensive.

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

Age requirement

- The minimum registered age² requirement for Flickr is 13 years.
- Where a young user is found to have lied about their age and breached Yahoo! terms of service, customer care will delete their Flickr account and associated Y! ID.

Product features

Certain measures are deployed to protect young users from inappropriate content and contact:

- Minimum ages apply to Flickr (as noted above) and technical blocks are in place to prevent users with a registered age of less than 13 years from obtaining a Flickr account. .
- All users and content partners are required to tag their content as “safe”, “moderate” or “restricted” in line with Flickr guidelines – see <http://www.flickr.com/help/filters/#258>. These categories correspond to safe search settings “off”, “moderate” and “on”.
- Safe search is “on” by default for all users. Logged-in users who have a registered age of 13-17 years cannot turn safe search to “off”. In other words, users registered as 13-17 years old cannot view content tagged as “restricted”³.

Other features

² Registered age is the age the user declared when creating his/her Yahoo! ID.

³ Users registered 13-17 years old can, however, change settings to allow access to “moderate” images. “Moderate” images include artistic nudes. Content more explicit than this is wrongly tagged and users are encouraged to report this to Flickr’s customer care team.

- It is Yahoo! policy not to actively promote or market Flickr to young users or to schools or youth organizations.
- Advice to parents (noted above) provides information to parents about other non-Yahoo!/non-Flickr tools (such as parental controls) which they can use to supplement safety features provided by Yahoo!

Note: Flickr does not provide tools which allow parents to control their children's accounts.

Principle 3: Empower users through tools and technology

Profiles

- Yahoo! users can only create a Flickr account if they have a registered age of over 13 years.
- Users may create an online identity or nickname rather than use their real identities.
- Sharing Messenger ID and email address is optional and, where users select this option, it is set to "share with your contacts" by default, not "public". Users can choose to leave this field blank.
- Flickr profiles are not full profiles. They are akin to 'user cards'. They are incidental to the purpose of the site. Flickr is about uploading, sharing, and discovering photos. Users can create a profile page where they can share more information about themselves and their interests. They can also share their web URL or blog link but it is not required. A profile is not the main entry point to Flickr for a user – i.e.: a user would typically visit a photostream and, if he chooses to, could visit the profile also, if they wanted more information.
- Users only have to provide Yahoo! with an email address and can choose not to complete their profile form⁴. UK Home Office Task Force good practice on social networking determined the risk to 13-17s from this type of profile to be low and Yahoo!, along with other providers, decided to permit all these 'user cards' to be public by default.
- Profiles of users registered as 13-17 years old are not searchable.
- Users may delete their Flickr account and information in their profile at any time.
- Flickr is widely used by family groups to keep in touch and to share photos and short videos. For this reason, Flickr allows users to connect regardless of age.

Technical tools

- Users registered 13-17 years old, and logged in, are not able to access images which are tagged as "restricted". In other words, they are unable to turn safe search to "off"⁵.
- A user can label their uploaded images as safe, moderate or restricted. If they do not label the content correctly and it is reported, the entire account could be marked as 'moderate' or 'restricted'. A user can request a review by customer care at any time, and the entire account will be assessed. If

⁴ See <http://www.flickr.com/help/profile/?search=profile#50>

⁵ See footnote 3 above

a user correctly understands how to moderate even their images that contain moderate or restricted content, their account can be marked as safe⁶.

User-initiated tools

- Users can send and receive invitations to connect with other users on Flickr. Users can decline or ignore invitations. They can also block or 'ignore' another user and delete users from their contacts list if they accept an invitation and change their mind afterwards.
- Users can organize their contacts into "friends", "family", or "friends and family", or just "contacts" without any special privileges that friends or family have.
- Users may change their privacy settings on their profile(s) to control who sees different elements of their profile and apply different access controls to individual photos. Users can choose to keep all their photos private or to share them with all users or with a particular group in their contact list (i.e.: "friends", "family", or "friends and family").
- Users can access and amend their account information at any time via a permanent header and footer link on all Flickr pages.
- Users can prevent other users from commenting on their photos by blocking them or turning off comments on all photos for all users.

Reporting abuse

- See comments on Principle 4 below.

Educating parents

- See comments on Principle 1 above.

Principle 4: Provide easy-to-use mechanisms to report conduct or content that violates the terms of service

Flickr provides users with a number of easy-to-use and prominently-placed tools to make reports to customer care:

- There is a permanent and prominent footer on every Flickr page which links to a "report abuse" form. Users can report a range of violations via this link.
- There is also a prominent "flag this photo" link alongside every image on Flickr which allows users to report an image that may breach terms of service and require review by Flickr staff. If other Flickr users also click the link, the photo will be hidden from the main public pages and from search automatically.

⁶ See <http://www.flickr.com/help/filters/#252?>

In all cases, users are guided on what information to provide with their report and/or what steps they can take to resolve the matter themselves. The report abuse form is easy to understand by all users, including children.

Users receive an on-screen or email notification of their report. Abuse reports from users are acted upon in a timely way and are typically resolved within 48 hours. More complex reports generally require further investigation and may take longer to resolve. Likewise, some cases may be resolved in less than 48 hours.

Principle 5: Respond to notifications of illegal content or conduct

Reports about content or conduct

- Yahoo! has in place clear procedures to handle complaints about content or conduct which breaches terms of service. These are typically handled by customer care agents.
- Serious abuses of a Yahoo! service may be escalated internally to a dedicated team within the Legal group which provides professional support and advice on more complex matters and determines an appropriate response.
- Abuse reports from users are acted upon in a timely way and are typically resolved within 48 hours. As noted above, more complex reports generally require further investigation and may take longer to resolve but others may be resolved in less than 48 hours.
- Users are advised to contact the emergency services if there is an immediate threat to life.

Liaison with law enforcement

- Yahoo! has dedicated points of contact for law enforcement agencies in Europe and processes to receive and process lawful requests for assistance. These include arrangements to handle urgent matters out of hours.
- Where reporting mechanisms exist, Yahoo!'s Legal team has processes in place to pass on suspected illegal content or reports of suspected grooming of minors to the relevant enforcement body.

Liaison with other agencies

- In all European markets, Yahoo! supports the local hotline (INHOPE member) responsible for handling reports about images of child sexual abuse.
- Yahoo! provides links to such organizations in its Help Central pages (see comments on Principle 1 above).

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

- Users access their account information via a “Your account” link at the foot of every page on Flickr (as well as by clicking your name in the header/top right of the page). This allows users to easily view their privacy settings. Users can edit their profile and change their privacy settings at any time via this link.
- A permanent “Your Privacy” link at the foot of every page on Flickr links to a dedicated Privacy Centre for each international market. This outlines the practical steps users can take to manage their privacy and personal information. It also includes advice on posting information about themselves and content to Yahoo!’s networking services such as Flickr.
- It is clear to users when completing their profile what content will be public.
- This information is provided in accessible and easy-to-understand language for all users.

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

See comments on Principle 1, Principle 3 and Principle 5 above.

3. Other information

This section provides an outline of any other information that is relevant with regards how the company has considered the Principles.

Since the first review of Flickr, Yahoo! has made the following changes to the child safety features:

- The report abuse page now contains a specific option to report grooming/harassment, in addition to advice about how to block or ignore users;
- Yahoo! is in the process of launching locally relevant versions of Yahoo! Safely sites containing online safety information for teens and parents, as well as safety guides for all Yahoo! products. The UK version of this site is available at <http://uk.safely.yahoo.com/> and via a permanent link at the foot of the Yahoo! UK & Ireland front page. The next phase of this programme will provide links from product pages in individual markets to the relevant local safety site.
- Flickr FAQs will contain a link to the local version of Yahoo! Safely so that young users have ready access to relevant safety information in their language.

This information can be published: Yes