

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 Bebo, including a short description of the services it offers that fall into the category of “social networking” as outlined in the Principles.

Bebo (www.bebo.com) is a popular social networking site that connects users to everyone and everything they care about. It was founded in 2005 and since May 2008, has been part of AOL’s People Networks division.

Bebo combines community, self-expression and entertainment, enabling users to consume, create, discover, curate and share digital content. Bebo allows users to find and communicate with friends as well as discover, experience and share user-generated content. Users can create profiles and interact with friends’ profiles, send messages to other users, join groups, become fans of bands, use third party applications, and using third party services, upload and share photos and videos.

Bebo has a membership of more than 45 million¹ individuals worldwide with experiences optimized for the US, UK, Ireland, Australia, New Zealand, Canada, Poland, France, Germany, Italy, Spain, India and the Netherlands.

Bebo recently launched a series of new products including, *Social Inbox*, which allows you to organize your messages in one easy-to-use inbox, *Lifestream Platform* which delivers real-time, chronological updates from all of your friends from *Delicious*, *Facebook*, *Flickr*, *Myspace*, *YouTube* and *Twitter*, and *Lifestory*, an interactive display of life events in chronological order.

Users can also access the Bebo experience through their mobile phone, enabling them to send and receive SMS updates and alerts, update their Bebo profile, add photos to their gallery, send virtual gifts and access mobile content.

Bebo, and its parent company AOL, takes the safety and wellbeing of its users very seriously, as reflected in the range of safety and education features and tools on its service as outlined below. We also engage heavily in a range of multi-stakeholder dialogues on internet safety across the world including: the EU social networking task force; the UK Council for Child Internet Safety and its predecessor the Home Office Internet TaskForce; the UK cyberbullying taskforce; the Technology for Wellbeing group in Ireland; and the US Internet Safety Technical Task Force.

¹ Internal figure

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

The following is an outline of how Bebo has considered the EU Safer Social Networking Principles in relation to its Social Networking Service(s). 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

Bebo Terms of Use and Privacy Policy

To help users to enjoy the Bebo site in a safe and responsible way, Bebo has very clear Terms of Service (www.bebo.com/TermsOfUse2.jsp) that outline unacceptable user conduct and content, and potential consequences of violating the Terms including suspension and/or loss of the Bebo account. Similarly, our Privacy Policy outlines what data is collected, how it is used and how users can change their privacy settings (www.bebo.com/Privacy2.jsp). Links to both policies are prominent – at the foot of every page, where users are accustomed to finding ‘help’ and ‘contact’ links – and can be reached from any page on the site.

Bebo Safety Education and Messaging

Bebo provides education and tips about online safety and privacy in clear, relevant and age-appropriate language throughout the site. Bebo places a link to its safety page – www.bebo.com/safety – on every page on the site, again in a prominent position at the foot of the page. The page contains links to relevant online safety and security resources from a country appropriate to the language in which the user has chosen to view the site – for example, when French is selected as the language, the page features a link to www.e-enfance.org; Dutch features a link to www.digibewust.nl.

The safety page also features a series of animations on topics such as: basic safety information; why privacy matters; managing privacy settings; thinking before you post photographs and other content; mobile safety; respecting your online community; cyberbullying; how to report abuse. These animations, including their content and format, were created in consultation with young people and parents to ensure that they were accessible and clear. Bebo links to additional resources for parents to help them keep their kids safer online such as *Know It All for Parents* and *ConnectSafely*.

Bebo places context-specific safety messages in areas where young people make decisions about how to interact with the community. For example, when users register they are strongly advised to keep their profile Private if they are under 21. When users sign in to use the service their IP address is visible along with a message that tells them that they are not anonymous online.

Bebo has worked with teachers and education authorities to develop materials and lesson plans specifically for teachers. These are available from the dedicated website www.safesocialnetworking.com. Bebo also took part in an industry-led education initiative

<http://en.teachtoday.eu>, which sought to address the potential knowledge gap between teachers and their students regarding new technologies, and is available in a number of European languages.

Bebo Well Being (*Be Well*)

In addition to providing safety and privacy education to our users, we believe that social networks such as Bebo have huge potential to positively help young people address broader issues in their lives. Research findings indicate that many teenagers fall prey to abuse both offline and online without ever having violated applicable laws. For others, personal attributes render them vulnerable both to law breaking and victimization. Bebo has therefore created a site called *Be Well* (www.bebo.com/bewell). This is a well-being centre, which allows support providers to use the Bebo platform as a means to engage with young people in need of their services. Bebo has partnerships with support organizations on issues such as depression, self-harm, drugs and eating disorders. Our goal is to help provide support to those who have fallen victim to abuse and to empower young people with the knowledge to identify possible risks to their personal safety and well-being and to seek appropriate help to mitigate those risks.

Bebo is also heavily involved in the *Technology for Well-Being* good practice policy group (www.technologyforwellbeing.ie/). This group brings together a number of stakeholders, including, representatives from the technology, research and non-profit sectors to explore opportunities to work collaboratively in developing initiatives that harness the power of the Internet and related technologies to improve wellbeing. Web 2.0 offers mental health, social care and support service providers a myriad of positive opportunities to educate and raise awareness of the services offered to young people, as well as deliver those services from within an online community.

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

Minimum Age Requirement

Bebo's Terms of Service clearly outline that users must be 13 or older to use Bebo, and that by registering for the Bebo service, they represent and warrant that they are 13 or older.

On registering for the service, users are asked to enter their date of birth. If that date indicates that they are below the permitted age, they are prohibited from registering. A cookie is employed to restrict those under-age users from re-registering.

Bebo conducts textual searches to help identify users that have provided a date of birth that indicates that they are 13 or older, but who subsequently post information on their profile that indicates that they are below 13. Upon discovery that a user is not 13 or older, Bebo will delete that user's account and profile.

User Generated Content & Conduct

Bebo's Terms of Service outline what kinds of member conduct and content are prohibited, and users are able to report any conduct or content that breaks those terms using the 'report abuse' button, as outlined in Principle 4.

In addition to responding to user reports of inappropriate content, Bebo proactively seeks out inappropriate content:

- Kebei software scans all hosted images for potential pornography; potential pornographic images are flagged for human review;
- Users who are discovered to have uploaded pornography have their accounts deleted;
- Inappropriate URLs are blocked from the site;
- Groups are monitored for inappropriate content;
- Thumbnail images of recently uploaded videos are reviewed for potentially inappropriate content;
- The most recently watched videos within a given timeframe are reviewed to further identify inappropriate content.

Commercial Content Standards

Bebo also has a policy for professionally produced content to ensure that content is age-appropriate and in-line with applicable national laws and regulations – www.bebo.com/ContentStandards.jsp. The policy also takes recognised rating systems (for example, *PEGI* system for computer games, the *BBFC* guidelines, and the *Internet Content Rating Association* labels), and industry self-regulatory codes of conduct (in particular the *Broadband Stakeholder Group* guidelines on content labelling, www.audiovisualcontent.org) into consideration. The standards state that content providers that upload professionally produced content onto Bebo should consider:

- Applying a guidance label to content that is permitted on Bebo, but that contains moderate content (sexual content, violence, language, drugs, alcohol etc).
- Age-restricting content that is permitted on Bebo but that contains stronger content (sexual content, violence, language, drugs, alcohol etc).

The Content Standards outline what constitutes moderate and strong content. Bebo has provided partners with a means to label and age-restrict their content, and they are responsible for taking the necessary steps for compliance with the standards. The labels appear in a clear and easy to understand manner above the video and content that is age-restricted is not viewable by users who are registered below the relevant age. By employing such a strategy Bebo facilitates users making informed choices with respect to the professionally produced content they consume on our platform.

Principle 3: Empower users through tools and technology

Bebo was an active participant on the *UK Home Office Internet Task Force* which developed the Good Practice Guidelines for Social Networking and User Interactive Services

<http://police.homeoffice.gov.uk/operational-policing/crime-disorder/child-protection-taskforce>. Bebo adheres to the guidelines laid out in that document regarding minimizing the risk of unwanted or inappropriate contact between young people and adults. Bebo employs the following tools and technologies to empower users (it is worth noting that many safety features on Bebo pre-date the guidance):

- It is not possible to search for users under the age of 16 using search engines;
- All profiles on Bebo are Private by default;
- Setting a profile to Private means that only 'friends' may view the profile or contact the user;
- Users are given the ability to block other users and to reject friend requests;
- Users can choose to allow only friends to post comments on their profile and can delete unwanted comments;
- By default the age of users under 16s does not appear on their profile
- Users are able to pre-moderate/review comments before they appear on their profile;
- Users can restrict the age range of people able to contact them;
- Users are able to report inappropriate contact from or conduct by another user on every profile page (see Principle 4).
- Information about these tools and their use are available to users, parents and teachers at bebo.com/safety which is accessible from all pages (see Principle 1).

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

Bebo operates a robust Report Abuse system, and users can report any breach of Terms or any other behaviour, contact or content that they find inappropriate.

Bebo offers a prominent and convenient 'Report Abuse' mechanism for users to report unacceptable behaviour that they encounter on our network. Report Abuse links are available on each profile page, photo album, group and posted application.

Upon clicking the Report Abuse link, users are given the option of removing the user as a direct friend (if the users are direct friends), blocking the user, reporting abuse or filing a police report. Users are given clear guidelines regarding when to use each option and what each option entails.

With regards the 'report abuse' and 'file a police report' options, users are told in clear age-appropriate language what information they need to supply and how the reports will typically be handled.

The information is referred to Bebo's abuse management team of trained professionals who process

violation complaints.

Following the abuse management team's assessment of the report, users who are found to be in breach of the Terms are either issued a conduct warning or have their accounts deleted depending on the severity of the breach.

Bebo provides links via both the safety page and via its Be Well centre (see Principle 1) to organizations that can provide users with assistance with issues such as depression, bullying or eating-disorders.

Principle 5: Respond to notifications of illegal content or conduct

Bebo also recognizes the importance of working with law enforcement, and has arrangements in place to share reports of potentially illegal content or conduct with relevant law enforcement agencies.

We also actively engage with the relevant enforcement authorities (including the *UK Home Office's Single Point of Contact* training program) to educate investigators about how to lawfully obtain data from Bebo.

Bebo has a distinct route to report suspected online predator behaviour. This includes critical education material designed to help those unsure about whether the behaviours with which they are concerned constitute online predator behaviours. Reports received through this route are dealt with as high priority and reports are disseminated to the appropriate law enforcement agency.

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

Bebo's Privacy Policy outlines what data is collected, how it is used and how users can change their privacy settings (<http://www.bebo.com/Privacy2.jsp>) and is accessible from all pages, via a link on the footer of the page.

Bebo allows users to manage their personal information and privacy by offering them a series of options. User can choose:

- Whether their profile is viewable by "Everyone" (public) or "My friends only" (private);
- The minimum and maximum age of members who can contact them;
- Whether their age is visible on their profile or not – by default age is not visible if date of birth indicates the user is under 16;
- Whether the number of times their profile has been viewed is visible or not;
- Whether other users can see if they are online or not;
- Whether the length of time they have been a Bebo member is visible or not;
- Whether their profile is shown in search results (note: users under 16 are not searchable.)

Users are able to access and alter their privacy settings at any time – either via a link situated in a prominent place at the top of every page on Bebo, or via the ‘edit profile’ link underneath their photograph on their profile page.

In addition to featuring context specific privacy messages in areas where young people make decisions about privacy (such as featuring the following message next to the public/private profile option: **Safety Tip:** If you are under the age of 21, we strongly recommend the 'My Friends Only' setting), Bebo encourages users to take a safe approach to privacy on its safety page – www.bebo.com/safety, which features animations on why privacy matters and managing privacy settings, and which is accessible from every page on the site.

Details provided on registration are not directly mapped onto the user’s profile – for example users are given the option at registration of whether to display their age or not (age is not displayed for users under 16) and the user name that is automatically created on registration is not the user’s full name as provided.

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

Bebo has established both proactive and reactive means to identify potential Terms of Service violations. As outlined in Principle 4 above, Bebo offers a prominent and convenient ‘Report Abuse’ mechanism and has found that asking users to report inappropriate material they encounter is a powerful tool in effectively policing products and services.

In addition to offering an effective Report Abuse mechanism, Bebo also proactively seeks out inappropriate content by:

- scanning the Bebo site for potentially pornographic content;
- reviewing thumbnail images of recently uploaded videos to look for potentially inappropriate content;
- reviewing the most recently watched videos within a given timeframe to further identify inappropriate content;
- utilizing an image filter which identifies images that may contain nudity and flags them for human review.

The potential violations, including illegalities that are identified through both proactive and reactive means are then processed as outlined in Principle 4 and 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.

If you have any questions about Bebo's self-declaration please contact pressoffice@beboinc.com

This information can be published: Yes