

## **Internet Technical Safety Taskforce – Request for Input Bebo and AOL**

Bebo and AOL are pleased about the opportunity to provide the Internet Technical Safety Task Force with input ahead of its final report. This response provides an overview of Bebo's approach to safety on its social network, as well as the more general approach taken by AOL in its other Internet services.

### **What safety issues do you attempt to address on your site?**

Excluding the more universal online threats including virus, spyware, spam and phishing, there are two sets of child protection issues that Bebo and AOL work to address in our respective services. When assessing risk, we consider:

1. Traditional categories of potential online risk, which include conduct, content, and contact; and
2. Young people becoming perpetrators as well as the victims of harm.

Categories of Potential Online Risk: These categories include:

1. Inappropriate content, which includes exposure through the Internet to pornography, violence, racist content, misinformation and propaganda that can negatively impact young people.
2. Inappropriate contact, which includes contact between adults with a sexual interest in children, or by young people who solicit other young people.
3. Inappropriate conduct, which relates to how young people behave online through social networks. Problems here include:
  - a. Bullying or victimization, which includes behaviors such as spreading rumors, excluding peers from one's social group, and withdrawing friendship or acceptance, or
  - b. Risk-seeking behaviors, which includes, divulging personal information, posting sexually provocative photographs, lying about real age or arranging to meet face-to-face with people only ever previously met online.

Young People as Perpetrators: One of the central features of Web 2.0 is the increasingly active role of young people as producers, publishers and disseminators of content. Although much of this activity produces beneficial content, it is also important to remember that young people can initiate or participate in harmful activities, such as cyberbullying and cyberstalking. This fact needs to be taken into consideration when proposing safeguards and solutions.

### **How do you measure the risk that youth face on your site?**

AOL and Bebo assess risk first at the product development stage and then on an ongoing basis, and then develop and assess the available solutions. We calculate risk based on assessment of certain factors that may be present in a particular service, such as the following:

1. Is there interactivity through service such as chat, IM, and email?
2. Does the service offer file sharing or storage capability?
3. Is there a search component?
4. What content can users post through services such as text, graphics, audio, videos?
5. Is it a public or private service?
6. Who is the target audience? Is the service intended for a teen or adult audience?
7. What is the level of interaction between adults and minors?
8. What information is collected, either actively or passively?
9. What are the access points to the service?

By analyzing these factors and identifying the pertinent risks, it is then possible to apply technology and industry safety recommendations to mitigate the risks. The risk assessment process provides an opportunity to develop innovative and bespoke safety features.

Risk evaluation is an ongoing process. Bebo and AOL have online safety teams involved in product development. These teams integrate a combination of user protections, empowerment tools, reporting capability, safety messaging, and enforcement to reduce risk to our customers. The teams also monitor activity on a particular service after it is launched in order to adjust policies and enforcement as necessary.

**What technical (and non-technical) efforts have you undertaken to make your site safer for youth? Please list all features, policies, collaborations, etc. Indicate which safety issues these efforts attempt to address and which age groups are targeted in this approach. Please note if these are in-house efforts or if they are outsourced or a part of a collaboration and, if so, who your partners are. For each effort, please indicate your metrics for success.**

Both Bebo and AOL are leaders in online child protection and have developed a strong set of Internet safety tools for use on our services by our customers, as well as a strong collaboration with law enforcement.

### **BEBO**

For its social network, Bebo has developed a holistic three-pronged approach to risk management by attempting to *secure the service*, *support users* and implementing proactive and reactive *crime prevention strategies*.

### 1. *Helping Secure the Bebo Service*

Terms of Use and Other Policies: Bebo has Terms of Service that clearly outline unacceptable user conduct and content. Our Privacy Policy outlines what data is collected, how it is used and how users can change their privacy settings. Both policies can be reached from any page on the site.

Safety Features: Bebo has been an active participant on the UK Home Office Internet Task Force that developed the Good Practice Guidelines for Social Networking and User Interactive Services. Bebo adheres to the guidelines laid out in this document. It is worth noting that many safety features on Bebo pre-date the guidance. The following are some examples of Bebo's safety features:

- a. All profiles on Bebo are Private by default meaning only "friends" may view the profile.
- b. It is not possible to search for users under the age of 16 using search engines.
- c. Users are given the ability to block other users.
- d. Users are able to review comments before they appear on their profile.
- e. Users are restricted from re-registering with a false age if they have previously attempted to register with an underage date of birth.
- f. Users are able to view and alter their privacy settings at any time; they can change their profile from public to private (and vice versa); they can allow only friends to post comments on their profile; they can hide the number of times their profile has been viewed; they can restrict the age range of people able to contact them.
- g. Users can delete their accounts and thereby their profiles.

Proactive Efforts: In addition to responding to user reports of inappropriate content, Bebo proactively seeks out inappropriate content using software and other mechanisms to review such content (which includes video content and thumbnail images).

### 2. *Supporting User Education and Well-Being*

Education: To help users to enjoy the Bebo site in a safe and responsible way, Bebo provides education and tips about online safety and privacy in clear and relevant language throughout the site:

Bebo places a link to its safety page on every page on the site, [bebo.com/safety](http://bebo.com/safety) as well as featuring links to relevant online safety and security resources. The safety page features a series of animations on topics. These animations, which are continually reviewed and updated, were created in consultation with young people and parents to ensure that they were accessible and clear.

Bebo also 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 with messaging which details that they are not anonymous online.

Bebo has also worked with teachers and education authorities to develop materials and lesson plans specifically for teachers. These are available from the dedicated website [safesocialnetworking.com](http://safesocialnetworking.com). Bebo 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. Although the site was developed as part of a European project, the guidance that is offered is equally applicable to teachers and education professionals around the world.

Well-Being: 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](http://www.bebo.com/bewell) ([www.bebo.com/bewell](http://www.bebo.com/bewell)). This is a well-being center, which allows support providers to use the Bebo platform as a means to access 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.

In addition, Bebo is heavily involved in the Technology for Well-Being good practice policy group. 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.

### *3. Crime Prevention Strategies*

Bebo operates a robust Report Abuse system, and actively encourages users to report any breach of Terms or any other behavior or content that they find inappropriate. Every profile page contains a Report Abuse link located underneath the profile picture which allows the abuse management team to quickly view both the sender and the subject of the report. 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. Users are also able to flag inappropriate content in the same way, by clicking on the link which appears between every photo and video.

Bebo also recognizes the importance of working with law enforcement. We 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 pedophile behavior. This includes critical education material designed to help those unsure about whether the behaviors with which they are concerned constitute pedophilic behaviors. Reports received through this route are dealt with as high priority and reports are disseminated to the appropriate law enforcement agency.

## AOL

AOL has a longstanding commitment to safety across the variety of online services that it offers. With respect to child safety, AOL deploys a broad set of technological and policy solutions, including:

- Age-appropriate programming for kids and teens
- Technological solutions
- Monitoring, reporting and enforcement procedures
- Law enforcement cooperation
- Support for public policy
- Safety messaging and education

### 1. *Age-Appropriate Kids & Teens Programming:*

In its AOL online service, AOL offers age-appropriate content areas for kids and teens. Kids Online services children 12 and under, while beRED is designed for teens between 13-17 years old. AOL uses industry ratings to program these areas with age-appropriate music, movie clips and video games and other content. Programming and advertising in the Kids Online and beRED areas are approved for use by our Policy and Regulatory team.

### 2. *Technological Solutions*

Parental Controls: AOL has a long history of providing children and families with a safer online experience. More than a decade ago, AOL introduced Parental Controls to help prevent children from accessing undesirable or inappropriate content. We continue to update and enhance our Parental Control software to stay current with changes in technology and online features. Parental Controls are available free on the Web at [parentalcontrols.aol.com](http://parentalcontrols.aol.com).

Key features of AOL's Parental Controls include:

- a. **Pre-Set Age Controls for Web Browsing:** we make the set up process easy by offering pre-set age ranges such as Kids (12 and under), Young Teen (13-15) Mature Teen (16-17) to automatically align Web filtering and monitoring settings to provide an age-appropriate online experience.
- b. **Parental Flexibility:** When a child tries to access a Web site that is blocked by Web browsing, Parental Controls offers a "Get Permission Now" button which lets the parent approve immediately. If the parent is not close by, the child can send an email to his or her parent for approval. The email Web request shows the name of the Web site and provides the ability to immediately approve or deny access directly from the email.
- c. **IM and Email Controls:** Parents can know a child's online friends by setting approved IM and email contacts.
- d. **Time Limits:** Parents can manage a child's Internet time allowing access to the Internet during specified times.
- e. **Activity Reports:** Parents can choose to view a child's Internet activity online or have a daily or weekly activity reports sent automatically to their email.

SafeSearch: We provide a default SafeSearch feature on AOL Search ([search.aol.com](http://search.aol.com)). This feature automatically filters out sites with explicit content so consumers can get accurate, reliable results with fewer worries about stumbling across any of the "questionable" material on the Web. Users can customize their filter level at [search.aol.com/aol/settings](http://search.aol.com/aol/settings) or remove the feature all together.

Screening for Child Pornography: AOL has implemented technologies to identify and remove images of child pornography and to help eliminate the sending of known child pornography. The process creates unique digital signatures from apparent pornographic images and then uses the signature to eliminate further dissemination of the image. We maintain a library of the signatures. When we identify the transmission of one of the images, the transmission is blocked and the image and user information is referred to the National Center for Missing and Exploited Children (NCMEC) for investigation. This procedure provides law enforcement with vital information necessary in prosecuting purveyors of child pornography. Our approach has now become part of a broader cooperative industry effort to remove these images.

Privacy Protections for Communications Tools: AOL offers privacy-related settings within products such as email and instant messaging that enable consumers to control their own online experience by determining who can interact with them:

AIM/AOL instant messaging users have the option to:

- a. Allow all users: Any AOL or AIM user can see that the customer is online and can send them instant messages
- b. Allow only users on the customer's Buddy List: Only people whose screen names the customer has added to the Buddy List® window can see that the customer is online and send them instant messages.
- c. Custom Allow List: Only the people whose screen names the customer has added to the list can see that that the customer is online and send instant messages.
- d. Block all users: No one can see that the customer is online or send them instant messages.
- e. Custom Block List: Only the people whose screen names the customer has added to the list will be prevented from seeing that the customer is online and from sending them instant messages.

E-mail users have the option to:

- a. Allow mail from all senders
- b. Allow mail from Bebo and associated AOL domains only
- c. Allow mail only from people the customer knows.
- d. Block mail from all senders.
- e. Custom: Allow and/or block only people whose email addresses the customer adds to the list.
- f. Block email containing pictures and files

### 3. *Monitoring, Reporting and Enforcement*

Report Abuse: AOL-branded services offer a prominent and convenient "Report Abuse" button for consumers to report unacceptable behavior that they encounter on our network. Our Report Abuse mechanism automatically captures text of IM and chat conversations so that they are authenticated and cannot be manipulated prior to sending the report.

The information is referred to teams of trained professionals who process consumer complaints on a 24x7 basis. The team is trained to handle images of child pornography and text-based child solicitations as well as:

- a. Hate speech
- b. Harassment/cyberbullying
- c. Self-harm
- d. Reckless behavior of minors
- e. Sexually-explicit material

### 4. *Law Enforcement Support*

Law Enforcement Training: AOL works to train law enforcement personnel in venues across the United States. In 2007, AOL delivered state-of-the-art technology and forensic training to the National District Attorneys Association; the National Association

of Attorneys General; the National Child Advocacy Center; the American Prosecutors Research Institute; the Naval Justice School; several Internet Crimes Against Children regional task forces; the Federal Energy Regulatory Commission; and 14 separate audiences of law enforcement investigators and prosecutors at the National Center for Missing and Exploited Children.

Law Enforcement Support: AOL assists law enforcement on thousands of cases per year. Through support services, such as our 24-hour dedicated law enforcement hotline, our team responds to law enforcement requests, answers officers' questions about what types of information would help their cases, and provides guidance on obtaining the right information. Litigation Support: Since 1995, we have offered pre-trial litigation support, as well as fact and expert witness testimony on criminal cases involving records obtained from AOL services. In 2007 AOL testified in approximately one dozen criminal cases throughout the United States, in the role of "custodian of records" and, in more complex cases, in the dual role of fact and expert witness on AOL technologies and procedures.

Amber Alerts: AOL was the first ISP to initiate an AMBER Alert program by which our customers can receive e-mail and IM alerts targeted to their area.

5. *Support for Safety-related Public Policies*

AOL has worked closely with legislators and others in industry to develop and support child protection legislative initiatives throughout the States including; laws to prohibit online enticement of minors and Internet safety curricula requirements, as well as legislation to improved data preservation, prevent cyberbullying and strengthen enforcement. .

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6. *Safety Messaging and Education*

AOL recognizes that education is one of the most effective ways to help protect against child predation. In our continuing effort to teach online safety we:

- a. Built [SafetyClicks.com](http://SafetyClicks.com), a safety blog that features articles, videos, and topical blog posts designed to support and inform parents as they teach their kids to navigate in the Internet.
- b. Offer safety tips to kids and parents at the product level (such as on AOL's Kids' Message Boards).
- c. Provide child online safety education in the form of formal presentations or hands on demonstrations at schools, PTA or other organized meetings.
- d. Work with a myriad of Child Advocacy Organizations to help educate kids, parents and caregivers about safe Internet use.

**What results can you share about the actual impact of your various efforts in #2 to date? Please be as specific and data-driven as possible. What lessons have you**

**learned from your efforts to execute in #2? If any of your approaches have not been as successful as you hoped or have had unexpected consequences, please provide a detailed case study.**

We measure the success of these programs by looking at:

1. Decreases in Events: The reduction in child endangerment events reported on our service.
2. Law Enforcement Participation: The number of law enforcement training sessions conducted by AOL.
3. NCMEC success: The number of arrests and convictions made from AOL graphic and text-based reports sent to NCMEC.
4. User Monitoring: The number of legitimate abuse reports submitted by our users.
5. Parental Controls: The number of parents using Parental Control tools.
6. Technology Adaptation: The number of outside Internet services adapting AOL's or similar child protection technologies.

**What can you share about any efforts you are planning to launch in the future? Please describe in as much detail as possible. What problem are you trying to solve with the additional efforts and how will you measure success?**

University Alerts: In response to the tragedy at Virginia Tech, AOL embarked on a project to make alerts available to colleges and universities. Through this program, colleges and universities can send emergency notifications to through email, IM and text messaging to students, faculty, employees, and other interested persons. The program is currently in the pilot stage at Shenandoah University in Virginia.

New Content Standards: Bebo recently finished a review of its commercial content standards policy to validate that it is consistent with Bebo's commitment to offering its audience an appropriate social networking experience. Bebo has also taken recognized rating systems and industry self-regulatory codes of conduct into consideration. Bebo's new standards will help our partners better identify prohibited content; content that needs to be age-restricted; and content that requires a guidance label. Additionally, Bebo will soon provide its partners with the ability to age-restrict and label their content at the point they upload this material.

**Based on what you've learned in trying to execute safety measures, what should the Technical Advisory Board know about dealing with actual implementation issues?**

Bebo and AOL would like to re-iterate our belief that there is no single "solution" to online child predation - and that only a multi-faceted approach is likely to succeed in minimizing the risk of harm to young people.

Furthermore, we believe that parental involvement cannot be mandated. AOL and Bebo provide parents a broad variety of tools and controls designed to help them protect their children online, as well as a steady stream of safety tips and other safety information. Despite these efforts, however, there are still a large number of parents who neglect to participate in the online experience of their children. This suggests that education must continue to be a focus.

There are, however, some clear bright spots. We have found that the “Neighborhood Watch” concept is effective. Asking users to report inappropriate material that they encounter serves as a powerful tool in effectively policing products and services. Users want a clean environment and are happy to report bad actors as long as they see action taken when they report.

We have learned that education is an effective means to protect children. To that end, we actively work with the education sector and supply them with the tools, knowledge and skills they need to educate young people to use the internet safely and responsibly.

We have also learned that online communities can be a tremendous force for good. To compensate for a range of support deficits that may exist in a young person’s life, Bebo has worked with mental health and social care support organizations to ensure that its users have ready access to sources of expert advice and support from within the online community they inhabit. This can result in a number of positive outcomes, not least of which is that access to support and advice online can normalize help-seeking as well as de-stigmatize issues like mental health, poor body image and concerns about family relationships. These are precisely the vulnerabilities that predators leverage when soliciting young people online.

### **What concerns do you have based on your own experiences?**

We have learned that a “silver bullet” cure the dangers of the Internet does not exist. The safety challenges online are remarkably complicated, and moving forward we need to keep in mind the fact that:

1. The line between moderating and censoring becomes more challenging in the Web 2.0 world.
2. Context is relevant. What is ok to say in one kind of forum is not ok to say in another kind of forum
3. Restricting minors from popular content and services without viable, age-appropriate alternatives may push them to mature areas that they do not belong.
4. Implementing technological solutions often fosters a game of cat and mouse. Determined users can often find ways around technical safeguards.

### **What are the strengths and weaknesses of implementing technical solutions?**

Strengths:

1. Automates the processing of vast quantities of information rapidly and intelligently.
2. Reduction of human error.
3. Results can inform programmers of research the findings of which augments understanding of patterns and processes of both use and misuse of a service.
4. Constant moderation and review.
5. Scalability with minimum increase in resources.
6. Self-correcting results – parameters can be re-calibrated as knowledge base grows.

Weakness:

1. Keeping technology up to date with current trends and issues.
2. Lack of nuance that can lead to over-broad application (for example, the contexts in which words and phrases are used are as important as the word or phrase at issue).
3. Technologies can be gamed.
4. Technologies are not consistent over platforms.