

**REPORT OF MID-TERM REVIEW MEETING OF
THE CEO COALITION TO MAKE THE INTERNET
A BETTER PLACE FOR KIDS**

JULY 2012

The meeting took place on 11 July 2012 and it was chaired by Mr Robert Madelin, Director-General of the Communications Networks, Content and Technology Directorate-General of the European Commission.

Representatives of 28 of the Coalition's 31 member companies attended the meeting, as did representatives of more than 30 third parties (child welfare NGOs, researchers, freedom of speech advocates etc.).

The meeting was aimed at analyzing the progress made by the Coalition in the 5 areas: simple and robust reporting tools, age-appropriate privacy settings, wider use of content classification, wider availability and use of parental controls and effective takedown of child abuse material, as well as defining the next steps to be taken until the end of the year.

Overall, progress has been registered in all of the 5 action areas as all companies were willing to engage in discussions outside their comfort zone, but more needs to be done in order to achieve the commitments made in the [Statement of Purpose](#), especially when it comes to content classification and effective takedown of child abuse material.

As a number of presentations addressed the issue of monitoring and review, it was noted that a common approach to this would be needed. Any such approach must allow for independent review. Here there was support from the NGOs for an active role in this process but it was accepted also that any mechanisms and processes must be proportionate in terms of the resources needed by the companies. A meeting will be held later in 2012 to discuss options for this.

The following main discussion points and conclusions were reached for each of the 5 action areas:

1. Simple and robust reporting mechanisms

The leaders of action 1 presented the main achievements in the area and the next steps foreseen until the end of 2012.

The main achievements as presented by the Coalition members (details available in the progress report for action 1):

- The Coalition has collected input through a survey among members as well as 3rd party stakeholders and NGOs to understand recommended requirements for reporting tools and gather current practices with an aim to provide guidelines.
- The survey gave insights into questions like types of content to be reported, categories, feedback and design/location of the reporting facility etc.
- Some Coalition members have shared their achievements concerning reporting mechanisms;
 - In Spain major operators have icons on their websites linked to national helpline and hotline
 - Browser extension solutions cf. practice in France, Spain and the Netherlands.
 - Feedback mechanisms improvements made by e.g. SNS

Proposed next steps by the Coalition for Action 1:

- Mobile operators and other industry stakeholders will work to provide reporting Apps for smartphones and tablets and other devices when relevant.
- Industry will work with NGOs and Hotlines in order to provide tools such as browser extensions or direct links from websites and other messaging applications where appropriate and applicable for each different sector, to enable users to get in direct contact with NGOs/Hotlines to seek help with a single click.
- Industry will work on improving the way they give feedback and providing updates on reports of abuse where appropriate and applicable for each different sector, while not hindering law enforcement investigations, so users reporting abusive or harmful content have more information on how their reports are handled.
- A minimum set of categories has been proposed within cf. Action 1 progress report to take into account for those services where user generated content are hosted.
- A meeting with developers and hotlines / helplines is foreseen in the autumn.
- In addition the action leaders of Action 1 will contribute to discussion concerning measurement of the implementation and effectiveness of the reporting tools.

Discussion

The main points raised were:

- that timelines for the proposed actions were missing
- that the primary recipient of a report should be the one dealing with the content in question and that apps and browser tools need to take this into account;
- use by young people of reporting options and lack of use of reporting by young people because they felt it did no good;

Conclusions:

- The work showed already successful implementations of apps and visible, easy-to-find browser buttons in some countries and that these best practices should be taken up widely through the proposals for apps and browser extensions. Any decision by a company not to do so should be on the basis of proof that they are implementing something that is better.
- The categories are a starting point to providing desired commonality and familiarity for users but need to be taken further so that the familiarity extends across systems
- Performance criteria and feedback remains an area where progress can be made – and where there is potential to embrace new technology in generating and providing data.
- The links with helplines and hotlines, how these function across Europe and how developers can work with the helplines/hotlines to implement these links need to be investigated further through the planned autumn meeting. The Commission will liaise through the INSAFE network with the different national helplines and hotlines

2. Age-appropriate privacy settings

The leaders of action 2 presented the main achievements in the area and the next steps foreseen until the end of 2012.

The main achievements as presented by the Coalition members (details available in the progress report for action 2):

- Consultation and exchange of views between industry and 3rd parties on the topic
- Putting together a comprehensive database of industry current practices in the area
- Consultation of 3rd parties for gathering feedback on the current practices database and recommendations for best practices that are to be extracted from the database
- Some of the mobile operators have made a commitment to start the implementation of the mobile privacy guidelines for mobile applications
- The "Privacy Online Tracking Protection List (TPL) project
- Hack4kids hackathon

Proposed next steps by the Coalition:

- Following a preliminary analysis of the feedback from 3rd parties on the database of current practices, companies will make it clearer what the default privacy settings are for their services
- By the end of September the current practices database will be available in an interactive online version
- Recommendations of best practices/benchmarks to be put forward by industry per sector and obtain validation from NGOs.
- Discuss the assessment for action 2
- Hold discussions on the remaining commitments from the Statement of Purpose, namely: "We also intend to share current practice on the protocols by which we give clear information and warnings to users of the potential consequences of any changes they may choose to make in our default privacy settings."
- Consider a recommendation from INSAFE for a pilot project with teenagers to test age-appropriate privacy settings and information provided by service providers on those settings.

Discussion

The main points raised were:

- While there is sound research evidence for generally recognising that a level of maturity is reached around the age of 13, there is no research evidence about the age(s) at which children understand the consequences of what they post or of the privacy settings they use online in support of the current "rule of 13".
- The effectiveness and user-friendliness of existing mechanisms should be independently tested and verified in order for best practices to be properly extracted.
- "Privacy by default" for all users is a concept that should not be dis-regarded.
- Privacy is not delivered only via settings such as those on services like social networks and therefore, it may be necessary to also consider specifications for other services (such as apps developers for example).

Conclusions

- Best practices to be established by industry and NGOs together - recognising also that they had to be platform neutral and not necessarily requiring the same solutions for all the value chain.
- The chair mentioned the willingness of the Commission to take up the topic of under 13s in research in the future. For the work of the Coalition the rule of the age of 13 was going to be considered.

3. Wider use of content classification systems

The leaders of action 3 presented the main achievements in the area and the next steps foreseen until the end of 2012.

The main achievements as presented by the Coalition members (details available in the progress report for action 3):

- Overview of the current practices: closed vs. open environments; icons vs. descriptive labelling; age ratings vs. common principles.
- Consultation of 3rd parties on harmonization of existing rating systems; suitability and effectiveness of rating icons vs. descriptive labelling; gaps and/or market failure, if any.
- Exploration of solutions for interoperability and machine readability with relevant 3rd parties

Proposed next steps by the Coalition:

- **Apps** - Draw a list of best practices for app classification guidelines in order to achieve the following: international scope; classification levels transparent to consumers; criteria for levels similar across industry; expand public awareness and credibility; low friction process for industry; scalable framework. Content rating solution providers will be consulted to identify best practices for a cross-industry, international, transparent and low cost app rating system that any app store may endorse on a voluntary basis. A pilot to be kicked off in September.
- **User-generated content (UGC):** Workshop to be held on current practices and technical solutions. Summary issue paper in order to assess the feasibility of pragmatic and cost-effective solutions.
- **Interoperability and machine readability:** Coalition to draft specifications recommending an open call for tender to the European Commission for a feasibility study addressing interoperability of existing content classification systems and machine readability. The study should identify and propose technical solutions to overcome existing obstacles but will not predetermine a commitment by industry to implement any given recommendation.

Discussion

The main points raised were:

- The group is behind the timetable set in the Statement of Purpose.

- A lack of commitment towards a valid EU-approach to content classification and of willingness of companies to cooperate on apps and UGC
- Achieving harmonization is not the objective of the group but an EU-valid approach to content classification, as per the Statement of Purpose
- Unlikelihood of users who upload content online to self-label. UGC classification should not rely on this. On the contrary, some categorization has to be done by machines.
- Next steps for apps concern all companies, not just those who do not have a rating system in place. All apps stores providers to participate in future discussions
- Good practices in the area of content classification should be scalable in order to become solutions.

Conclusions

- Coalition members need to take seriously their commitment in this area
- The proposal for the Commission to launch a call for tenders in the field of interoperability and machine readability would most likely not give any results before 2014 and action 3 would have failed in this case
- More organisations involved in providing classification would be invited to attend and provide input for the next steps
- The current good practices should be analysed again against the mandate of the Coalition as per the Statement of Purpose in the next steps in search for pragmatic solutions before the end of the year

4. Wider availability and use of parental controls

The leaders of action 4 presented the main achievements in the area and the next steps foreseen until the end of 2012.

The main achievements as presented by the Coalition members (details available in the progress report for action 4):

- Analysed basis for cross value chain development of parental controls
- Advised, helped and motivated coalition members to develop and improve parental controls – at least 23 coalition members have now introduced or plan to introduce parental controls
- Continuous improvement of the controls already implemented by members
- Collected examples of what “active choice” could mean for companies in different parts of the value chain.
- The following options were considered by group (1) Have parental control tools available but only promote them by increasing the availability, awareness and ease of use; (2) Deploying some sort of “active choice” mechanism whereby users are forced to make choices upon the first use of a service or device; (3) Having parental control features on by default combined with an opt-out mechanism. In the opinion of the workgroup Option 1 provides the best conditions for broader and more effective uptake of parental controls, although it also recognized that a certain combination with Option 2, whereby parent-child interaction is stimulated by means of a contextual moment of choice, might offer additional benefits

Proposed next steps by the Coalition:

- Improve understanding about what constitutes a good parental control tool.
- Organize a “vendor workshop” in the autumn of 2012 to discuss generic design requirements on what might constitute “good” vs. “bad” parental controls.
- Focus on the awareness raising element of commitment
- Refine and agree a review process
- Continued review and development of parental control tools

Discussion

The main points raised were:

- Active choice is crucial as it is not enough to provide the tools but we need to make sure consumers see them
- The document suggesting how tools could be deployed by active choice should be categorised by device / service rather than by industry sector.
- Tools must be easy to use, readily available and teamed with education. They must also take into account the rights of the child and make a distinction between end-user and beneficiary.
- Child welfare NGOs support the "On by default" option that does not imply less parent / child interaction. This option is also used for deployment of antivirus software. Furthermore, it was pointed out that at least 6 of the members of the CEO coalition already use this option without adverse effects.
- Vulnerable children should be explicitly addressed and the "on by default" setting might be their only security net. It was argued that what is good for vulnerable children (i.e. on by default) would also be good for "average" children.
- Parental control tools can be implemented at different levels (network / device etc.), and the further up on network level the protection is the less configurable it becomes, diminishing the user empowerment.
- The experience from the UK shows that active choice / on by default encourages parents to think about how to manage their children's online experiences. Existing customers are receiving information by mail/email.
- For greater impact more industry players should be present in the Coalition.
- Children should not be considered to be "minority users" of any general purpose service or device as they have been referred to in the progress report. Children use internet enabled devices more and more and at a younger age and must therefore be considered to be a substantial user group.

Conclusions

- Deployment by active choice (meaning a forced prompt) is crucial for the success of the group and therefore the group will have to look more into that option, as well as at best practice in the area and see how customers respond to this.
- Leaders of action 4 will look to involve also leaders of action 2 (age-appropriate privacy settings) and 3 (wider use of content classification) in the workshop that will be organized with the vendors in autumn.
- The group focus on "the average child" using the logic of proportionality and in the absence of evidence of added benefit of a different approach.

5. Effective takedown of child abuse material

The leaders of action 5 presented the main achievements in the area and the next steps foreseen until the end of 2012.

The main achievements as presented by the Coalition members (details available in the progress report for action 5):

- In the February Coalition meeting a first exchange of views took place between CEO coalition members. In March this was followed by a survey on how CEO Coalition members handle the takedown of child abuse material (CAM) – where 20 of 31 companies responded. A summary of the results of the survey was circulated.
- In the April stakeholders took part in Coalition meeting.
- In June a paper on Notice and Takedown processes by Mobile Alliance Against Child Sexual Abuse Content was circulated and two half-day workshops on (1) Detection tools and (2) Notice and Takedown procedures were organised.

Proposed next steps by the Coalition:

- Further facilitate discussion between hosting services providers and law enforcement and hotlines to improve take down of CAM through notice and takedown procedures with an aim to identify bottlenecks, seek solutions and address them.
- Explore the expansion of the Mobile Alliance Transparency Paper to other CEO coalition members
- Action leaders stressed that they would like to reach a conclusion on the way forward regarding the further exploration of Detection technologies, as this issue has been at the centre of discussion repeatedly in Coalition Action 5 discussions, with no agreement as yet on future actions. A number of Coalition members have expressed disagreement with what is stated in the Progress Report of Action 5. What was proposed was continuing the discussions concerning detection tools between hosting services providers, law enforcement and hotlines to improve take down of CAM; to assess if and how technologies available for detection of CAM in images and videos can be made available, seek a legal analysis regarding the use of detection tools on hosting services and to see an objective evaluation of the effectiveness of such tools.

- Action leaders underline that it is clear at this point that a one size fits all model would not be the best solution and therefore any suggestions made should be voluntarily adaptable for coalition members who find that an approach would suit their specific company.
- Action leaders suggest organising another workshop in the autumn; this is to be decided based on dialogue with Coalition members.

Discussion:

- The chair repeated the commitment in the Statement of purpose to do "all within our power, including by proactive steps, to remove from the internet child sex abuse material." Ruling proactive actions as out of scope goes against this – any company not willing to take on board proactive steps should clearly come forward and explain why.
 - Deutsche Telekom raised concerns about potential unlawfulness of a proactive approach.
 - France Telecom – Orange also voiced concerns whether such approaches infringed privacy.
- European Digital Rights said that there is a need to make clear what is asked of the industry and that any filtering of data must have a legal basis.
- NSPCC stressed that there is no solution to this problem without using technology and that law enforcement is not able to deal with it as it is now. Also commented on the worst-of the worst list with confirmed victims, suggesting also including illegal images of the slightly older victims and not already solved cases in future developments of such lists.
- The question of fundamental rights was raised in the discussion with the chair commenting that also the rights of the child need to be taken into account.

Conclusions

- The Action leaders would set out a clear specification of a typical pilot action.
- The Commission will ask the Article 29 Data Protection Working Party for an opinion.
- The dialogue with law enforcement and hotlines will be followed up through further workshops in order to identify possibilities for improving the rate of notice and takedown.