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23 March, 2011

Joint Select Committee on Cyber-Safety
Parliament House
Canberra ACT 2600

By email: jscc@aph.gov.au

Re: *Inquiry into Cyber-safety for Senior Australians*

Dear Committee members:

I refer to your recent invitation for Facebook to make a submission to your inquiry into the cyber-safety of senior Australians. Facebook welcomes this opportunity to provide more information about how social platforms, such as Facebook, provide senior Australians with opportunities to connect and maintain communities and relationships safely.

In summary, Facebook encourages the Committee, when shaping its final recommendations, to take account of the benefits that social platforms, such as Facebook, offer seniors and the many tools and other activities undertaken by Facebook to promote the digital citizenship and online safety of seniors.

In advising on the best practice safeguards for the online safety of senior Australians, the Committee should be mindful of Facebook's mission -- to make the world more open and connected. If the experiences that people, including seniors, have on Facebook are not positive, then the site will no longer be useful to them to connect and share and we will no longer fulfill our mission. Some of the positive impacts from engaging via social platforms such as Facebook have been demonstrated by a detailed study undertaken by Pew Research Center. The study found that Facebook users on average have more close relationships, get more social support than other people and are much more politically engaged than non-Facebook users.[1]

To support positive experiences on the site, Facebook works to promote the confidence and safety of seniors on the site through our privacy controls, our real name culture, our Statement of Rights and Responsibilities, our reporting infrastructure, our security systems, and through education, outreach and partnerships.

Facebook also invites the Committee to consider strategies that promote "digital citizenship", outlined in more detail below, as a way to promote the online safety of senior Australians.

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[1] Pew Internet and American Life Project, *Social networking sites and our lives*, June 16 2011
http://pewinternet.org/Reports/2011/Technology-and-social-networks/Summary.aspx

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Facebook Connects Senior Australians and their Communities

Over 10 million Australians actively use Facebook to connect and share with the people, places and things that they care about. Globally, more than 50 per cent of our active users engage with the site daily.

Every day, countless seniors in Australia connect via Facebook with the friends, family, places, events and things that they care about. Social platforms such as Facebook can assist senior Australians to "bring the outside world in" at a time when they may face greater challenges getting out and about in the physical world. For example, one report explains:

> *"More than just a tool or channel for information, the Internet (and social networking, more specifically) has become a way for aging adults to connect to their loved ones and maintain their communities and relationships in ways more powerful than anything they ever imagined."*[2]

Similarly, another recent report, which examined how families are using technology such as social media, found that:

> *"It is clear that social networks are not just modes of communication but part of the culture, especially among the young, though increasing in older groups....In a strictly instrumental sense, social networks have made possible connections that would rarely have happened without this medium – re-contacting friends from 40 years ago, sharing information and experiences with family members separated by great distances, and enabling almost constant contact and coordination among groups".*[3]

In addition to formal reports, personal stories also demonstrate the value that seniors in Australia derive from using Facebook. We were thrilled to learn of Eva Woodrow, the Nambour-based great-grandmother, who turned 101 years of age in December last year.[4] Eva is an active Facebook user, who says that one of the secrets to living longer is "to not sit down and rest - you have got to keep doing things and absorb things." This approach may explain one of her reasons for enjoying the use of Facebook.

Books have been written to help older generations to enjoy their experiences on Facebook, including "The Facebook Guide for People Over 50".[5] Facebook provided technical advice on this guide. We would be happy to provide the Committee with a copy of this book if that would be useful for the Inquiry into Cyber-Safety for Senior Australians.

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[2] Aylin Zafar, Facebook for Centenarians: Senior Citizens Learn Social Media, *The Atlantic* 31 August 2011 http://www.theatlantic.com/technology/archive/2011/08/facebook-for-centenarians-senior-citizens-learn-social-media/244357/1/?single_page=true

[3] AARP, *Connecting Generations*, page 23 http://www.aarp.org/technology/social-media/info-02-2012/connecting-generations.html

[4] http://www.couriermail.com.au/questnews/sunshine-coast/tech-savvy-great-grandmother-eva-woodrow-is-the-nations-oldest-facebook-user/story-fn8m0yxo-1226211420491

[5] Paul McFedries, The Facebook Guide for People Over 50, (2011) http://www.amazon.com/Facebook-Guide-People-Over-50/dp/0470875178

Facebook Privacy Controls Empower Senior Australians

Facebook has a number of tools that empower and educate Australian seniors about how they can effectively control their personal information on the site. As Facebook's founder and CEO has explained, Facebook was created "on the idea that people want to share and connect with people in their lives, but to do this everyone needs complete control over who they share with at all times."[6] To realize this foundational goal, our platform is designed with these things in mind (for example, permissions model, dashboards to manage the information you've shared, mobile privacy controls, among other tools). We want to give senior Australians the power and controls to share what they want, when they want, with whom they want. When it comes to privacy, we are focused on control, simplicity and transparency.

Our commitment was recently verified as part of a recent audit conducted by the Irish Data Protection Commissioner (DPC) of Facebook Ireland, the company with whom Facebook users in Australia contract when agreeing to the terms of use on the site. Through its audit, the DPC:

> *"found a positive approach and commitment on the part of [Facebook Ireland Ltd] to respect the privacy rights of its users".[7]*

This thorough and detailed audit by the DPC was undertaken from September to December in 2011 and published at our request on 21 December 2011.[8] Substantial resources were dedicated to ensure that the DPC had all the information it needed to conduct a comprehensive independent audit of our policies and practices.

Some of the tools that empower and educate seniors about how to control their privacy include a Data Use Policy that is made available at sign-up, privacy control to set restrictions on which audiences can see specific types of information, interactive tools to learn more about how their information appears to others, and finally, education and partnerships to promote awareness of the importance of privacy and privacy tools and controls.

Everyone who signs up for a Facebook account agrees to our Terms of Use and our Data Use Policy, at the point of sign-up. We have recently made the information and links to our terms and Data Use Policy more prominent to new users by linking to it above the "sign-up" button and by making the text and link to the policy more prominent. This allows senior Australians to clearly and easily see, for example, what controls they have over their information and how it is stored and used on the site. Links to our Privacy Policy and to our Help Center, which provides user-friendly, non-legal explanations about privacy, are included throughout the site.

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[6] Mark Zuckerberg, "Our Commitment to the Facebook Community" November 30, 2011 https://blog.facebook.com/blog.php?post=10150378701937131

[7] *Irish Data Protection Commissioner*, Report of Audit – Facebook Ireland, 21 December 2011, page 3 (http://dataprotection.ie/viewdoc.asp?DocID=1182).

[8] *Id.*

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Facebook also provides a number of tools and dashboards to visually display the privacy settings that senior Australians have chosen for their information on the site. For example, in a drop-down menu available when they log in to Facebook, they can easily see a "Privacy Settings" page that provides an easy overview of the controls set for the different types of information senior Australians choose to share on Facebook.[9]

We continue to improve the tools that empower our users with granular control over their information. Most recently, we moved these controls inline right next to information that is being shared.[10] This allows senior Australians to select the audience for each piece of information, such as a status update or photo, at the time they choose to share it.

To further educate seniors about the controls they use for their information, Facebook offers a number of interactive tools. These allow senior Australians to see how their profile looks to a member of the public or to a specific person they choose, to preview their public search profile, to download their information and/or to try the same tool that many of our advertisers use to target ads on Facebook.[11]

To educate people about new and improved tools and controls as they are rolled out, Facebook undertakes a variety of education measures, including tutorials and new product notices when seniors next log in to their accounts.[12]

Facebook also partners with government, industry and community groups to promote awareness of the tools and controls that we provide. Most relevantly, we are looking forward to participating in the upcoming Privacy Awareness Week that will take place from 29 April to 5 May 2012.

Facebook's Reporting Infrastructure Keeps Seniors Safe

Nothing is more important than the trust that people have in Facebook. People throughout the world use Facebook to connect with friends, family, and issues they care about. Trust is earned over time and through repeated positive experiences with our service. It is reinforced every time we follow through on our commitments. Most importantly, for the Committee's work, if our older generations do not have positive experiences on Facebook, then the site will no longer be a useful and helpful way for them to engage with their communities.

We rely on a number of tools to work towards promoting positive experiences for people on Facebook.

Firstly, Facebook enjoys a real name culture, where people must associate their actions with their true names and identities in front of their friends and family. We believe that a culture of authentic

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[9] https://www.facebook.com/settings/?tab=privacy
[10] https://blog.facebook.com/blog.php?post=10150251867797131
[11] https://www.facebook.com/about/privacy/tools
[12] See for example, this video tutorial about Privacy Settings:
https://www.facebook.com/video/video.php?v=366944610483

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identity has made Facebook less attractive to bad actors who generally do not like to use their real names or email addresses. People are less likely to engage in negative, dangerous, or harassing behavior online when their friends can see their names, their posts and the information they share.

Our real name culture creates accountability and deters bad behavior since people using Facebook understand that their actions create a record of their behavior. Authenticity is key to people's experience on Facebook, just as it is in real life. The more authentic, the more rewarding and richer the experience will be. Various news organisations have reported that requiring people to comment on their sites using Facebook and its real name culture improves the quality of comments, compared with anonymous or pseudonymous comments.[13]

Secondly, use of Facebook is governed by the 'Statement of Rights and Responsibilities' (https://www.facebook.com/terms.php), which prohibits the posting of content that harasses, intimidates, or threatens any person, or that is hateful or incites violence. Facebook's real name culture empowers people to report others whose behavior violates our policies.

Thirdly, Facebook has a robust reporting infrastructure was recently examined as part of the audit conducted by the Irish Data Protection Commissioner (DPC) of Facebook Ireland, the company with whom Facebook users in Australia contract when agreeing to the terms of use on the site.

As the Irish DPC explained about our reporting infrastructure:

> "Facebook provides its users with a variety of ways to report abuses on the site. Users can go to the Help Centre and find pages of information about abuses to report. [Facebook Ireland] also has contextual reporting buttons on every page and associated with every piece of content. On every profile, there is a report link; on every photo there is a report link; and on every advertisement there is a way to report it. There is a means to report abuses included on every profile, photo and advertisement."[14]

The Irish DPA concluded:

> "We examined the accessibility of options available to a user who wishes to report an issue to Facebook. It is considered that it is straight-forward for a user to locate the 'Report Abuse' options via the 'help' drop down option on the user profile page and within 2 mouse clicks is within the 'Report Abuse or Policy Violations' of the Help Centre'."[15]

And further:

> "We are satisfied that [Facebook Ireland Ltd] has appropriate and accessible means in place for users and

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[13] http://www.poynter.org/latest-news/media-lab/social-media/143192/news-sites-using-facebook-comments-see-higher-quality-discussion-more-referrals/

[14] *Irish Data Protection Commissioner*, Report of Audit – Facebook Ireland, 21 December 2011, page 137 (http://dataprotection.ie/viewdoc.asp?DocID=1182).

[15] *Id.*, page 141.

non-uses to report abuse on the site. We are also satisfied from our examination of the User Operations area that [Facebook Ireland Ltd] is committed to ensuring it meets its obligations in this respect.[16]

Our system leverages the 845 million people who use our site to monitor and report offensive or potentially dangerous content and includes systems to prioritize the most serious reports and a trained team of global reviewers who respond to reports and escalate them to law enforcement as needed. When people report the offensive content, we are quick to respond. People on Facebook regularly use the report links found on nearly every page of the site. This substantially increases the number of people reviewing content and behavior on Facebook and greatly enhances safety on the service. When someone's actions violate our policies or the law, we can assign corrective action. In serious or potentially criminal matters, this involves account termination or referral to law enforcement.

In addition to this reporting infrastructure, Facebook promotes awareness of safety generally through partnerships with government, industry and other organisations around the world. Facebook has participated in numerous educational outreach programs with industry, educators, police and other community leaders.

Facebook also provides a number of resources to community partners to assist with those conversations. These include the Family Safety Center, which contains specific content for community leaders, educators, law enforcement (www.facebook.com/safety) and the Facebook Safety Page – dynamic safety content that people can get right in their News Feeds (with over 665,000 followers at present– www.facebook.com/fbsafety).

Facebook's work to promote the safety of older users is an ongoing commitment. We continue to innovate and improve our systems, tools and educational efforts. One example of this is our suicide prevention initiative. Since 2006 Facebook has had a series of partnerships with 21 suicide prevention agencies in 19 countries around the world, including Lifeline in Australia. Through these partnerships, people are encouraged to take action if they see friends on Facebook who are feeling down, unhappy, anxious or sad, and report this using Facebook's existing 'reporting' tools and the Help Center. Facebook will then put a partner agency in touch with the distressed friend to offer their support.

Facebook encourages the Committee, when considering best practice safeguards to keep senior Australians safe online, to ensure their recommendations are flexible enough to support ongoing innovations and improvements such as this by platforms such as Facebook.

Facebook Protects the Security of Senior Australians

To maintain the security of the information that older Australians choose to share via Facebook, we have built, and are constantly improving on, complex automated systems. After analyzing our

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[16] *Id.*, page 139.

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security practices and procedures, the Irish DPC described itself as "satisfied that [Facebook Ireland Ltd] is very pro-active in this area" and more specifically:

> *"as could be expected [Facebook Ireland Ltd] places an enormous and ongoing focus on the protection and security of user data. Our audit has confirmed this focus."*[17]

Our security focus is divided into three main areas – tools that empower senior Australians to take additional security measures, automated systems that detect and block malicious activity and education and awareness about security issues and the tools we offer.

Firstly, we empower seniors to set additional security protections for their account via the "Account Settings" page that is available via a drop down menu when they access their account. These additional protections include, for example, pre-approving the devices a senior commonly logs in to Facebook from so that they can be notified whenever their account is accessed from a device they haven't approved. When we see that someone is trying to access an account from an unusual device, we will ask that person to answer an additional verification question to prove his or her identity as the real account owner.[18]

Facebook continues to improve the security protections that it offers seniors. As recently as January this year, we announced the ability to experience Facebook entirely over HTTPS.[19] This option is useful if a person frequently uses Facebook from public Internet access points found at coffee shops, airports, libraries or schools.[20]

Secondly, we have systems that use anomaly detection to flag suspicious behavior, quickly block and remove spam and malicious links, and help people restore access to their accounts in the rare event that they are compromised.

We have a blacklist of malicious URLs, which are blocked from being distributed through Facebook. For the small number of people who are affected by security issues, we have built an innovative remediation process that requires them to confirm their identity and take steps to re-secure their account, and teaches security best practices.

If we detect an account has been compromised because of various factors including suspicious activity or content, the account is automatically reset, the bad content deleted from across Facebook, and the user put in a remediation process. The process includes a McAfee virus scan of the user's machine.

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[17] *Id.*, page 108.
[18] https://blog.facebook.com/blog.php?post=389991097130
[19] As we explain in this blog post, HTTPS allows a secure connection to be made between the user and the website: https://www.facebook.com/blog/blog.php?post=486790652130
[20] https://blog.facebook.com/blog.php?post=486790652130

Finally, in addition to tools, education and awareness are essential to good security, and Facebook works hard to teach people how to be safe on the site and across the Internet.

We regularly post updates with tips and information about new threats to the Facebook Security Page (www.facebook.com/security). We also publish posts about security to the Facebook blog. We provide contextual education; for example, when you click on a link that hasn't been verified in an email notification, we warn you that you are about to leave Facebook and to be cautious. The Facebook Security Page has over 5 million fans. The Facebook blog reaches over seven million people. In addition, Facebook has donated hundreds of millions of ad impressions in an effort to drive traffic to these and other important resources, such as our abuse reporting infrastructure.

This week we have also been proud to partner with the Australian Competition and Consumer Commission (ACCC) as part of Consumer Fraud Awareness Week. We posted an interview with Dr. Michael Schaper, a Deputy Chair of the ACCC, about the key messages for the week[21] and posted daily security tips during the Week from our Facebook Australia page,[22] which has over 45,000 fans.

Digital Citizenship Can Empower Senior Australians

As part of finalizing its recommendations, Facebook invites the Committee to identify best practice solutions that will work to promote digital citizenship.

Digital citizenship typically describes the rights – and also the responsibilities – that each of us has in the online world, similar to the rights and responsibilities enjoyed offline. This can include, for example, the right to own the information that we create online, and to represent ourselves accurately to the audience of our choice. It also includes the responsibility to treat others as we want to be treated, to respect people's digital space, and to stand up for others online.

Promoting digital citizenship is a shared responsibility between government, industry and the community. Collaboration is required to help seniors manage their online reputations and provide them with the tools and knowledge to make sure they have a positive online experience. Part of this requires that community leaders, members of industry, and policymakers are digitally literate and engaged in conversations with seniors about how to stay safe online.

Facebook believes that user empowerment – both through the use of education and easy-to-use tools – combined with robust site reporting infrastructure and technology, creates the most effective environment within which to promote the safety and security of senior Australians on social platforms such as Facebook and to ensure that they can focus on the benefits this type of engagement brings them. This focus also allows the educational materials, tools, and reporting infrastructure to adapt and innovate to meet new challenges.

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[21] https://www.facebook.com/FacebookAU/posts/408776119136537
[22] For an example of one of these posts, please see
https://www.facebook.com/FacebookAU/posts/257671614320179

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Facebook thanks the Committee for the opportunity to provide this information and wishes the Committee well in its work in finalizing its recommendations.

Kind regards,

Mia Garlick
Head of Policy & Communications
Australia and New Zealand