

SUBMISSION NO. 18



*Parliament of Australia
Standing committee on communications inquiry into cyber-crime*

About Yahoo!7

Yahoo!7 offers a range of content, navigation and information services to internet users in Australia. Yahoo!7 is a joint venture between Yahoo! Inc and the Seven Media Group. Yahoo! Inc provides online products and services, offering a variety of services essential to users' life with 'social networking' features. These comprise Flickr (photo sharing), Yahoo!7 Video (commercial and user generated video sharing) and Yahoo!7 Answers (knowledge sharing). Yahoo!7 is focused on powering its communities of users, advertisers, publishers and developers by creating indispensable experiences based on trust.

[Note: Information in this submission is relevant to all Yahoo!'s 'social networking' services. Any relevant differences between products are noted.]

Inquiry Terms of Reference

The House of Representatives has referred the following matter to the Committee for inquiry:

- a) nature and prevalence of e-security risks including financial fraud and theft of personal information, including the impact of malicious software as viruses and trojans;
- b) The implications of these risks on the wider economy including the growing economic and security impact of botnets;
- c) Level of understanding and awareness of e-security risks within the Australian community;
- d) Measures currently deployed to mitigate e-security risks faced by Australian consumers:
 - a. Education initiatives
 - b. Legislative and regulatory initiatives
 - c. Cross-portfolio and inter-jurisdictional coordination
 - d. International cooperation.
- e) Future initiatives that will further mitigate the e-security risks to Australian internet users;
- f) Emerging technologies to combat these risks.

Furthermore, the Standing Committee has specifically asked Yahoo!7 to address the steps being taken by social networking sites to protect consumers from interference and misuse of photographic images and other personal information.

Submission

Yahoo!7 takes its responsibilities to its users very seriously and in particular has adopted multiple measures to help improve the safety and security of its users when using Yahoo!7 services. In fact, the social networking industry more broadly has worked closely with governments in several jurisdictions

(e.g. United Kingdom and European Union) on developing best practice guidelines and recommendations for businesses operating in this sector to work towards in their protection of users on their service. This is exemplified by such practices as the provision of 'report abuse' facilities and the engagement in public education. It is our submission that the EU Social Networking Principles (http://ec.europa.eu/information_society/activities/social_networking/docs/sn_principles.pdf) provide a sound precedent for benchmarking elsewhere. Yahoo!7 offers the same robust standards within Australia that Yahoo! delivers into international markets. Here is some more detailed information around how Yahoo!7 seeks to enhance the protection of our users' safety and privacy whilst engaging with our services.

1. Promoting safety education messages and acceptable use policies.

- a. Terms of use and community guidelines: on joining a Yahoo!7 service, all users are required to commit to terms of service which set out conditions of use. 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!7 ID (i.e.: withdrawing access to all Yahoo!7 services). In addition, Yahoo!7 has developed service specific guidelines around acceptable behaviours for community services (e.g.: Yahoo! 7 Answers <http://help.yahoo.com/l/au/yahoo7/answers/abuse/> and Flickr <http://www.flickr.com/guidelines.gne>). These set out in easy-to-understand language the dos and don'ts for users. They are widely available within each service, typically via a link in the page footer.
- b. Safety education and messaging: Yahoo!7 offer several mechanisms of raising awareness of safety and acceptable use in our products among users of all ages:
 - i. Safety information in Help Central pages (widely available across the site and in particular within social networking products), in-product guidance (notices in the registration flow, pop ups etc) and Customer Care responders.
 - ii. Permanent footers in community-based services linking to Yahoo!7's Community Guidelines and safety tips.
 - iii. Details of how to contact Yahoo!7 for feedback and information.
 - iv. Specific guidance on privacy and the posting of information and content on user generated services (e.g.: in the Yahoo!7 Privacy Policy <http://info.yahoo.com/privacy/au/yahoo/>).

Yahoo!7 expects that young users gain their understanding of safety issues from sharing information and experiences with their peers. For this reason, safety information is increasingly addressed directly to these users rather than parents. There is a range of other tools and sources of information expressly dedicated to help young users increase their awareness of the Internet and the Yahoo!7 world, and educating them how to use it responsibly.

- c. Community Management: Yahoo!7's community-based services have community-managers", staff members who engage with the community to promulgate and encourage respect for the standards of behaviour set by the community guidelines. 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 content they publish and share, and their treatment of others.

2. Ensuring that services are age-appropriate for the intended audience.

- a. Age requirement: the Yahoo!7 terms of service require users who join a community-based service to have a registered age of over 13 years (i.e.: the age declared in their Yahoo!7 ID). Where a young user is found to have lied about their age, Yahoo! Customer Care will delete their profile.
 - b. Product features: certain measures are deployed to protect young users from inappropriate content and contact:
 - i. minimum ages apply to Yahoo!7 community-based services (as noted above)
 - ii. mechanisms are in place to prevent users with a registered age below a certain level from accessing certain services (e.g.: age-verification for online gambling services in the UK) or being presented with age-inappropriate content (e.g.: age-targeting of advertising of alcohol).
 - iii. specific customer care processes are in place to escalate reports about under 18 users and to provide users with tailored guidance in email responses (e.g.: referring them to appropriate sources of help).
 - iv. The date of birth provided by the user within their Yahoo! account registration process cannot be modified by the registrant. This helps counter minors' attempts to access +18 contents on the Yahoo!7 properties – hidden behind an adult wall – by misrepresenting their age.
 - v. 'Rating and review' tools, commonly used to allow community members to share their view on the quality of a piece of content or a comment posted by another member, helps surface high quality content and earn it a wide audience but 'demotes' poor quality content (which, by definition, will have a limited audience).
 - c. Advertising: advertising content running on Yahoo!7's community-based services are regulated by a strict set of internal guidelines and enforced by the Yahoo!7 Legal Team. These also reflect good practice and relevant local regulations such as the Australian Association of National Advertisers Codes. These codes set out specific guidance on advertising aimed at children and advertising which may be unsuitable for children or cannot be targeted at children, in line with Yahoo!7 brand positioning. Such rules apply, for example, to the advertising of alcohol, some financial services and age restricted services such as cosmetic surgery or tobacco products. There are also specific rules on the portrayal of children in adverts. Yahoo!7 advertising guidelines are complemented by dedicated training for the Yahoo!7 Sales and Editorial teams.
 - d. Other:
 - i. Capture of some IP data associated with use of our community services and content uploaded by users;
 - ii. Contractual requirements with partners to meet Yahoo!7 standards.
 - iii. See also comments on point 3 below.
3. Empowering users through tools and technology.
- a. Profiles and invitations: As noted above, Yahoo!7 users can only sign up to a community-based service if they have a registered age of over 13 years (i.e.: the age declared in their Yahoo!7 ID). Users with a registered age of 13-17 years can be presented with a different profile (e.g.: Flickr) with more sensitive fields removed. These profiles are not searchable and are defaulted to 'private' (although a user may choose to make their profile visible to their 'friends' or all users). Users of this age are not able to access images which are flagged as "restricted" or adult. Meanwhile, the default user profiles in Yahoo!7 Answers and Yahoo!7 Video are not full profiles. They are more like

'user cards' and contain a very limited number of fields which, by default, do not prompt the sharing of personal details. Users are invited to create an online identity or nickname rather than use their real identities. There is specific safety messaging about posting content and accepting 'connection' invitations from other users. Users must expressly choose to create a fuller profile e.g.: by sharing their video playlist or share their contact details (i.e.: Mail or Messenger ID) with online friends or other users. All visitors to Yahoo!7 may browse Yahoo!7 Answers, Yahoo!7 Video and Flickr content anonymously without being registered or logged in if they wish to remain anonymous, though in this mode they cannot interact with other users. Users of all Yahoo!7 services may send and receive invitations to be connected with other users in a Yahoo!7 community. All users can refuse an invitation or simply allow it to expire without responding. Users can also 'ignore' or block another user and are encouraged to report any suspect behaviour to Customer Care for investigation.

- b. Technical tools: Yahoo!7 employs network level solutions to detect content that violates our terms of service including 'junk' filters (e.g. to detect profanities in Yahoo!7 Answers), randomly select content for human review (e.g.: on Flickr) and traffic flow monitoring.
 - c. User-initiated tools: As noted above, users can, for example, block or 'ignore' another user. Yahoo!7 users may also decline or ignore invitations. Users may change their privacy settings on their profile(s) at any time. All the necessary instructions are also collected within the Help Pages Central available widely across the Yahoo!7 properties.
 - d. Reputation: Yahoo!7 Answers awards users points for contributions they make to the community (e.g.: posting content that is respected by other users or reporting 'bad' content or behaviour). Likewise, points are deducted for bad behaviour or posting content of which breaches community guidelines or is misleadingly tagged. This is known as building 'reputation' within a community. Building reputation 'raises the stakes' for users and incentivises positive behaviour. This has helped build a body of committed users with 'high reputation' and has also provided the basis for introducing community moderation (<http://help.yahoo.com/l/au/yahoo7/answers/moderation/>).
4. Provide easy to use mechanisms to report conduct or content that violates the terms of service. An easily-identifiable "report abuse" flag or button is typically displayed on every page where user generated content can be posted on Yahoo!7. Users are encouraged to indicate in their report they type of abuse (e.g.: content breaching terms of service or inappropriate contact from another user) and reports are assigned accordingly in different queues in order to be effectively processed and analyzed by dedicated Customer Care agents. Users receive an automated response from Yahoo! Customer Care confirming the receipt of their complaint. Responses for certain types of reports will contain advice for users and sources of additional information or help (e.g.: sources of emotional support or contacts in law enforcement). Yahoo!7 also provides information about where else users can report questionable content or behaviour (<http://help.yahoo.com/l/au/yahoo7/abuse/>). Users are advised to contact their local emergency services in cases where there could be an immediate threat to life.
5. Respond to notifications of illegal content or conduct.
- a. Reports about content or conduct: Yahoo!7 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!7 service may be

escalated internally to a dedicated team within the Legal group which provides professional support and advise 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. More complex reports generally require further investigation and may take longer to resolve.

- b. Liaison with law enforcement: Yahoo!7 has dedicated points of contact for law enforcement agencies in Australia and processes to receive and process lawful requests for assistance. These include arrangements to handle urgent matters out of hours.
6. Enable and encourage users to employ a safe approach to personal information and privacy. Yahoo!7 has a dedicated Privacy Centre which outlines the practical steps users can take to manage their privacy and personal information. This includes advise on posting information about themselves and content to Yahoo!7's community-based services. The Privacy Centre is available via a permanent link at the foot of almost every page on Yahoo!7. Users may also edit their online profile(s) at any time by clicking on prominent "edit my profile" links.

Contact

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