



CYBER-SAFETY SUB-GROUP

**NATIONAL CHILDREN'S COMMISSIONER
INQUIRY INTO SELF HARM AND
SUICIDAL BEHAVIOUR IN
CHILDREN**

JUNE 2014

The AIMIA Digital Policy Group's Cyber-safety Sub-group (Cyber-safety Sub-group) welcomes the opportunity to input to the National Children's Commissioner's examination of intentional self-harm and suicidal behaviour in Australian children.

The Cyber-safety Sub-group makes this submission in case it is helpful to the Commissioner to understand the existing policies, tools and infrastructure that online companies have established to help people, including young people, who are in distress.

The key members of our industry who provide platforms that are popular with young people have in place specific measures to swiftly remove self-harm and suicidal content and to put distressed people in contact with suicide prevention organisations.

As providers of communications services, we believe that we can play a role in connecting people who are in distress with the resources and support services that can help them the best.

Many young people engage frequently online and share not only their celebrations of life, but also their disappointments. Research by the Young and Well CRC provides some helpful insights into the strong and positive role of one type of technology – social networking -- in the lives of young people, and how policy needs to balance this with the challenges:

This review finds that there are a number of significant benefits associated with the use of SNS¹ including: delivering educational outcomes; facilitating supportive relationships; identity formation; and, promoting a sense of belonging and self-esteem. Furthermore, the strong sense of community and belonging fostered by SNS has the potential to promote resilience, which helps young people to successfully adapt to change and stressful events. Importantly, the benefits of SNS use are dependent on good internet and media literacy: having the skills to critically understand, analyse and create media content. Maximising the benefits of SNS and promoting internet and media literacy may help protect young people from many of the risks of online interaction, such as cyber-bullying, privacy breaches and predation. For example, understanding how to produce creative content and manage the distribution of this content supports fully informed decision making and assessment of one's own, and others', privacy.

Policy currently focuses primarily on regulating the negative effects of SNS and social media, frequently framing digital citizenship within an online risk-management paradigm. This report finds that the benefits of social networking are largely associated with the participatory nature of the contemporary digital environment. Yet participation in creative content production, dissemination and consumption is largely overlooked in cyber-safety frameworks. The emphasis on the risks of SNS use is exacerbated by limited intergenerational understanding of young people's ability to navigate online environments and narrow definitions of youth citizenship. Reconceptualising these challenges in terms of expanding

¹ Social Networking Services

young people's digital citizenship opens up the potential to maximise the wide range of substantive benefits associated with online communicative practices.²

Similarly, Young and Well Cooperative Research Centre has also found that

There is a range of evidence suggesting that videogames have a positive impact on young people's wellbeing. Existing research suggests that videogames contribute to young people's emotional, social and psychological wellbeing. Specially, videogames have been shown to positively influence young people's emotional state, self-esteem, optimism, vitality, resilience, engagement, relationships, sense of competence, self-acceptance and social connections and functioning.³

² <http://www.youngandwellcrc.org.au/wp-content/uploads/2014/03/The-Benefits-of-Social-Networking-Services.pdf>

³ <http://www.youngandwellcrc.org.au/knowledge-hub/publications/videogames-wellbeing-comprehensive-review/> page 5

The Digital Industry's Approach to Safety and Content Management

The digital industry is committed to the safety of the people who use our services.

How our Industry Works to Prevent Self Harm and Suicide

User trust is the cornerstone of the services offered by the digital industry.

Our industry offers our services under policies that outline what people can and cannot do via these services. For example:

- Yahoo!7's Terms of Service <http://info.yahoo.com/legal/au/yahoo/utos/en-au/>
- Facebook's Statement of Rights and Responsibilities: <https://www.facebook.com/legal/terms>
- eBay's <http://pages.ebay.com.au/help/account/safety.html>
- Microsoft's Terms of Use: <http://www.microsoft.com/en-us/legal/intellectualproperty/copyright/default.aspx>
- Twitter's Terms of Service <https://twitter.com/tos>
- Google Safety Centre <http://www.google.com.au/safetycenter/>

In addition, many of the sites provide a more succinct explanation of the community standards that people must adhere to on the site. For example, Facebook's Community Standards (<https://www.facebook.com/communitystandards>) states:

Facebook takes threats of self-harm very seriously. We remove any promotion or encouragement of self-mutilation, eating disorders or hard drug abuse. We also work with suicide prevention agencies around the world to provide assistance for people in distress.

YouTube Community Guidelines (http://www.youtube.com/t/community_guidelines) state:

- Don't post videos showing bad stuff like ... drug or substance abuse.
- Graphic or gratuitous violence is not allowed. If your video shows someone getting hurt, attacked, or humiliated, don't post it.
- We encourage free speech and defend everyone's right to express unpopular points of view. But we don't permit hate speech (speech which attacks or demeans a group based on race or ethnic origin, religion, disability, gender, age, sexual orientation/gender identity, or their status as a returned soldier).
- There is zero tolerance for predatory behaviour, stalking, threats, harassment, invading privacy, or the revealing of other members' personal information. Anyone caught doing these things may be permanently banned from YouTube.

The Twitter Rules state that:

- **Violence and Threats:** Posting specific and direct violent threats are strictly prohibited on Twitter, with warnings and account suspensions enforced. We also encourage users to report such behaviour to law enforcement so that the threat can be properly evaluated and, if applicable, the behaviour prosecuted.

- **Targeted Harassment and Abuse:** Targeted harassment and abuse is not allowed on Twitter. The consequences for engaging in such behaviour include warnings as well as temporary or permanent account suspensions.
- **Private information:** You may not publish or post other people's private and confidential information, such as credit card numbers, street address or Social Security/National Identity numbers, without their express authorization and permission.

Microsoft's Terms of Use say users can't:

- Defame, abuse, harass, stalk, threaten or otherwise violate the legal rights (such as rights of privacy and publicity) of others.
- Publish, post, upload, distribute or disseminate any inappropriate, profane, defamatory, obscene, indecent or unlawful topic, name, material or information.
- Restrict or inhibit any other user from using and enjoying the Communication Services.

Yahoo!'s Terms state:

You agree to not use the Service to:

- a. upload, post, email, transmit or otherwise make available any Content that is unlawful, harmful, threatening, abusive, harassing, tortious, defamatory, vulgar, obscene, libelous, invasive of another's privacy, hateful, or racially, ethnically or otherwise objectionable;
- b. harm minors in any way;
- m. "stalk" or otherwise harass another; and/or

Each digital platform also provides tools that leverage the considerable and engaged communities active on our sites, to let us know when they believe that there are instances of content or conduct that violates our terms. For example:

- Facebook provides report links throughout the site:
<https://www.facebook.com/help/reportlinks>
- Yahoo!7 provides tools to assist in reporting inappropriate or harmful behavior such as our "Report Abuse" flags and the Abuse Help Forms. The "Report Abuse" flags are easily accessible mechanisms that enable a user to notify the customer care teams of a complaint about specific content.
- Twitter makes it easy to report concerns on the service by simply clicking the in-Tweet reporting button or by filling out a simplified online forms at the Help Centre (support.twitter.com/forms). These reports go directly to Twitter's highly trained user support and safety team.

- Microsoft has in place simple and easy-to-use reporting mechanisms which enables it to appropriately categorise and address an alleged report of abuse <https://support.microsoft.com/contactus/emailcontact.aspx?scid=sw;en;1671&ws=reportabuse>
- YouTube provides a flag system that enables a user to click a flag button to report a video which they consider to be inappropriate <http://support.google.com/youtube/bin/answer.py?hl=en&answer=118747>

Members of the Cyber-safety Sub-group maintain extensive review teams that operate 24/7 and work to swiftly take appropriate action with reports. We triage complaints dealing with the most serious cases first.

For example the Xbox Live service (40+ Million globally) has a Policy and Enforcement Team that is dedicated to the safety and security of the Xbox Live multiplayer service. This team responds to complaints made by users on the service, proactively identifies behavioral risks and takes enforcement action based upon a highly refined Code of Conduct and Terms of Use. The team also has very robust policies and operational processes in place related to moderation of User Generated Content (UGC), especially content that could be indicative of self-harm. The Policy and Enforcement Team works closely with authorities around the globe through the appropriate Microsoft legal channels to appropriately respond to these incidents.

Microsoft also owns and publishes a Code of Conduct that is incorporated by definition in the Xbox Live Terms of Use and also maintains general policies at <http://enforcement.xbox.com/>

In addition, all Cyber-safety Sub-group members continue to innovate and improve on our reporting tools.

For example, Facebook last year rolled out a new tool to assist with greater transparency in identifying the status of a report made via the Support Dashboard.⁴

On Youtube, the Safety Mode is a tool that operates at the family level. Parents are empowered to determine what content they wish their children to be exposed to. By switching on this tool, users have the option of choosing not to see mature content that they or their children may find offensive, even though the content is not against the YouTube Community Guidelines. Videos that have been age restricted will not show up in video search, related videos, playlists, shows and movies. A demonstration of YouTube Safety Mode is available at <http://www.youtube.com/watch?v=gkI3e0P3S5E>.

In a similar manner Microsoft provides the Family Service Centre <http://microsoft.com/security/family-safety/default.aspx#Overview>.

Yahoo!7 also builds accessible safety and privacy features into all its products, including privacy preferences, blocking capabilities, abuse flagging and FAQ safety guides that are

⁴ See e.g., <https://www.facebook.com/notes/facebook-safety/details-on-social-reporting/196124227075034> and <https://www.facebook.com/notes/facebook-safety/improved-tools-to-support-your-facebook-experience/473126442708143>

product specific (au.safely.yahoo.com/yahoo-products/) and general online safety tips (au.safely.yahoo.com/faq/).

To promote awareness of our policies, tools and safety best practice, industry provides help and educational information through specifically designed parts of their sites. For example:

- The Yahoo!7 specialised safety website⁵, which contains tools, tips, hints from experts and other information aimed at keeping children and internet users safe online.
- The Google Good to Know site⁶ and Safety Centre⁷, which contains safety tips from experts and information about Google's online safety tools.
- eBay's Policies Centre⁸ which includes information on phishing, protecting personal information and identity theft schemes⁹ and Trust and Safety Tutorials¹⁰.
- The YouTube localised Safety Centre¹¹, which contains content from local partners, including the Australian Communications and Media Authority, the Australian Federal Police, Kids Helpline and the Inspire Foundation on topics that include teen safety, and harassment and bullying.
- The Facebook Family Safety Centre, which contains information for parents¹², teachers,¹³ and teens¹⁴ on online safety.
- The Twitter Safety Centre¹⁵, which includes resources and information for parents, teachers, and young people, as well as Twitter's policies, guidelines and best practices.
- Microsoft's Safety Centre¹⁶ which gives consumers the ability to put in place family safety settings for Microsoft products and provides a range of different resources and information about online security and safety.

In addition to these initiatives, individual companies undertake their own education campaigns through initiatives such as Facebook's Be Bold Stop Bullying campaign¹⁷ which reached 600 000 Australians per month six months after it was launched, Google's Good to Know¹⁸ initiative, eBay and PayPal's Surf between the Flags¹⁹ initiative and Microsoft's Think U Know campaign that was conducted in conjunction with the Australian Federal Police.

⁵ <http://au.safely.yahoo.com>

⁶ <http://www.google.com.au/goodtoknow/>

⁷ <http://www.google.com.au/safetycenter/>

⁸ <http://pages.ebay.com.au/help/policies/overview.html>

⁹ <http://pages.ebay.com.au/help/account/protecting.html>

¹⁰ <http://pages.ebay.com.au/help/policies/tns-tutorials.html>

¹¹ http://support.google.com/youtube/bin/request.py?contact_type=abuse

¹² <http://www.facebook.com/safety/groups/parents/>

¹³ <http://www.facebook.com/safety/groups/teachers/>

¹⁴ <http://www.facebook.com/safety/groups/teens/>

¹⁵ <https://support.twitter.com/groups/57-safety-security>

¹⁶ <https://microsoft.com/safety>

¹⁷ <https://www.facebook.com/beboldstopbullyingau>

¹⁸ [http://www.amf.org.au/Assets/Files/MEDIA%20RELEASE%20-%20Good%20to%20Know%20Campaign%20helping%20Australians%20stay%20safe%20online.p](http://www.amf.org.au/Assets/Files/MEDIA%20RELEASE%20-%20Good%20to%20Know%20Campaign%20helping%20Australians%20stay%20safe%20online.pdf)

¹⁹ <http://www.canberra.edu.au/cis/tour/>

Most recently, and relevant to this inquiry, Facebook launched the Help A Friend In Need Guide, together with headspace and the Young and Well Research Centre. The Guide²⁰ provides guidance for young people about what to look out for in terms of what online posts their friends may make that indicate that they may be depressed and may need some help, and how to get that help.

All members of the Cyber-safety Sub-group also participate in the various awareness weeks organised by Government, such as, for example, Stay Smart Online Week, Privacy Awareness Week, Safer Internet Day, Australian Mental Health Awareness Week and National Day of Action against Bullying and Violence²¹.

The AIMIA Digital Policy Group recently launched the **Keeping Australians Safe Online**²² resource which outlines the resources provided by eBay, Yahoo!7, Google and Facebook and the group has actively distributed this within the community.

Leading members of the digital industry also collaborate with non-profit organisations and associations including The National Association for Prevention of Child Abuse and Neglect (NAPCAN), Inspire Foundation, The Alannah and Madeline Foundation, headspace, Project Rockit!, Kids Helpline, Bravehearts and Netsafe to receive expert advice about current trends and issues with the safety of young people and to ensure that these important organisations have the relevant information about the safety policies and tools that are available to them.

Other Specific Industry Measures with respect to Self-Harm and Suicide

Our industry takes threats of self-harm and suicide very seriously.

Leading members of our industry work closely with suicide prevention organisations here in Australia including Lifeline, headspace (the National Youth Mental Health Foundation), BeyondBlue, Reach Out, SANE and the Young and Well Cooperative Research Centre.

At an international level digital industry leaders Facebook, Google, Microsoft, Yahoo! and Twitter have worked to develop a best practice guide with US based Suicide Awareness Voice of Education (save.org) *Responding to a Cry for Help: Best Practices for Online Technologies*²³.

In addition leading digital platforms facilitate bringing people in need with suicide prevention resources. For example, anyone who searches for "suicide" is directed to the suicide resources in the Facebook Help Centre.

²⁰ <http://www.scribd.com/doc/227158258/FB-FriendInNeed>

²¹

<https://www.facebook.com/media/set/?set=a.10152301846022415.1073741827.363337977414&type=3&uploaded=36>

²² <http://old.aimia.com.au/home/industry-development/digital-policy-group/news/aimia-dpg-launches-cyber-safety-resource>

²³ <http://www.preventtheattempt.com/>

Facebook also works with suicide prevention agencies around the world to provide assistance for people in distress. In Australia, Facebook directs people to Lifeline Australia, headspace and Kids Helpline.²⁴ If Facebook receives a report of a person who is posting potentially suicidal or self-harm content, it reaches out to this person and provide localized contact details of agencies who provide specialized help in their area of the world. In cases where users promote, coordinate or encourage self-harm or suicide, Facebook removes the content, and educates the person about the content, and why it is not allowed on Facebook.

Google Search returns 'Need Help? In Australia 13 11 14. Lifeline Australia' as the first result for searches on how to commit suicide. Non-profit organisations such as Reach Out have confirmed that this has saved people's lives.

In addition, Google for NonProfits²⁵ provides non-profit organisations highly discounted or free products. This assists not-for-profit organisations to work efficiently. Specifically in the case of self-harm and suicide focused not-for-profit organisations and services, these organisations are presented to an individual when they use Google products to find information on these matters. In addition the You Tube platform specifically allows users to flag content about self-harm and suicide.

Twitter provides people with mechanisms to bring self-harm and suicidal content to the attention of their trained trust and safety agents. Twitter's support teams provide global, 24/7 coverage and are tasked with getting back to the person who makes the report and reaching out to the person at-risk to share guidance and support. Twitter provides the reported user with available online and hotline resources and encourages them to seek help. This includes phone numbers and LiveChat links to Twitter's local Australian partners headspace, BeyondBlue and Lifeline. More information on Twitter's safety and suicide prevention partners can be found at <https://support.twitter.com/articles/20171366-trusted-resources>.

The Way Forward

We understand the Commissioner's concern that gave rise to this inquiry was to examine how young people can be better protected from intentional self-harm and suicidal behaviour. Our industry shares the Commissioner's concern to promote the safety and well-being of all young people who connect and engage via our platforms. And we appreciate this opportunity to outline how we do our best to achieve this. We would be pleased to be in contact with the Commissioner as its considerations on this important matter progresses.

²⁴ <https://www.facebook.com/help/224061994364693>

²⁵ <http://www.google.com.au/nonprofits/>

About the AIMIA Digital Policy Group and it's Cyber-Safety Sub-Group

The AIMIA Digital Policy Group is the policy group of the Australian Interactive Media Industry Association that represents 460 digital players in the Australian digital industry.

The AIMIA Digital Policy Group's Cyber-safety Sub-Group represents key digital players including Facebook, Google, Twitter, Microsoft, eBay and Yahoo!7 on cyber-safety issues.