



Family
Online Safety
Institute

Protecting Online Reputation

Essay Submission from the Family Online Safety Institute

Family Online Safety Institute
(Non-profit Organization)

Jennifer Hanley jhanley@fosi.org
Emma Morris emorris@fosi.org

400 7th Street, NW Suite 506
Washington, DC 20004 USA
(202) 775 0158

The Family Online Safety Institute is pleased to offer this essay to the Office of the Privacy Commissioner (OPC) of Canada. We hope that this submission will provide the OPC with information that will assist them in ensuring that children are educated as to the importance of protecting, and indeed enhancing, their on and off-line reputation through their online activities. We appreciate the interest of the Commissioner into this important issue and look forward to the development of a comprehensive, and workable strategy on privacy and reputation.

The Family Online Safety Institute (FOSI)¹ is an international, non-profit, membership organization² working to make the online world a safer place for children and their families. We achieve this by identifying and promoting the best practices, tools and methods in the field of online safety. FOSI convenes leaders in industry, government and the non-profit sectors to collaborate and innovate new solutions and policies in the field of online safety. Through research, resources, events and special projects, FOSI promotes a culture of responsibility online and encourages a sense of digital citizenship for all. With roundtables, forums and conferences around the globe, FOSI plays an important role in driving the international debate.

FOSI is headquartered in Washington, DC, but works globally. In Canada we have worked with Telus for a number of years. Additionally, a large number of the companies that we partner with have a considerable presence in Canada, including Facebook, Google, and Twitter. We have actively engaged with the Office of the Privacy Commissioner of Canada and the Royal Canadian Mounted Police to advance the ideas of online safety, privacy and digital citizenship for all.

FOSI works to achieve its objectives through a multi-stakeholder approach to innovating best practices and sharing resources, and by actively engaging with policymakers around the world. For example, in the United Kingdom, FOSI has long been an active member of the UK Council on Child Internet Safety (UKCCIS)³ and now sits on the executive board. FOSI has also participated in similar multi-stakeholder groups at the European Union level⁴, and in the United States⁵. FOSI regularly engages at the federal and state level to provide resources and raise awareness about online safety issues and efforts.

FOSI has created comprehensive, user-friendly resources for professionals and consumers. For professionals and policymakers, we provide the Global Resource and Information Directory (GRID).⁶ In partnership with UNICEF, GRID was completely overhauled and updated in 2016, and now captures the challenges and responses to online safety around the world. It aggregates online safety laws, education initiatives, research and active organizations in over 190 countries, with a particular emphasis on efforts to combat online child sexual exploitation.

Furthermore, FOSI has developed a program to provide advice, tips and tools to empower parents to confidently navigate the online world with their kids.⁷ The Good Digital Parenting initiative (GDP) informs

¹ Family Online Safety Institute. Online at <https://www.fosi.org>

² FOSI members include: Amazon, AOL, AT&T, AVG, Comcast, Crisp Thinking, CTIA, Disney, ESA, Facebook, Google, GSMA, LinkedIn, Microsoft, MPAA, NCTA, Nominum, Photobox, Skout, Symantec, Telstra, Telecom Italia, T-Mobile, Twitter, Verizon, Vodafone, Yahoo!

³ United Kingdom Government. *UK Council for Child Internet Safety*. Online at

<https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis>

⁴ European Commission. *Creating a Better Internet for Kids*. Online at <https://ec.europa.eu/digital-single-market/creating-better-internet-kids>

⁵ National Telecommunications and Information Administration, United States. June 4, 2010. *Youth Safety on a Living Internet*. https://www.ntia.doc.gov/legacy/reports/2010/OSTWG_Final_Report_070610.pdf

⁶ Family Online Safety Institute. *The Global Resource and Information Directory*. Online at <https://www.fosigrd.org>

⁷ Family Online Safety Institute. *Good Digital Parenting*. Online at <https://www.fosi.org/good-digital-parenting/>

parents as to the technologies, sites, apps and services that their children may be using with ways to talk to their kids about how to stay safe online and protect their privacy and reputation. As part of this initiative, FOSI has produced checklists for teenagers on managing their digital reputation.⁸ GDP has blogs for parents on not oversharing online⁹ and for young people on improving their digital reputation.¹⁰ GDP also provides a video series that includes information for adults on how to help their teenagers maintain a positive online reputation.¹¹

FOSI believes strongly that all policies from governments and industry, as well as initiatives, should have a solid foundation in fact. FOSI has conducted numerous research studies¹² in the United States into the online behavior of teenagers and the concerns of parents. Privacy and reputation have been areas of focus, especially in the last three years.

FOSI's 2015 research on "Parents, Privacy and Technology Use," found that most parents have rules about their child's technology use, and 75% of parents have specific rules about what their children can or cannot post publically online.¹³ Furthermore, parents who often use technology with their child are more confident that they can manage their child's technology use.¹⁴ FOSI strongly suggests that parents and children go online together from an early age to help develop ongoing conversations about appropriate use of technology and privacy and recommends that the OPC encourages this.

It is not just children that need to be educated about protecting their online reputation, parents too are frequently sharing more information than they should be, or than their children are comfortable with. According to our recent survey, 19% of parents who have social networking accounts, acknowledge having posted something online that their child may find embarrassing in the future. 13% of parents say that their child has already been embarrassed by something they have posted, and 10% say their child has asked them to remove an online post that relates to them.¹⁵ We also heard anecdotes in our 2015 focus groups from parents who felt they may have shared too much about their kids. The task of protecting a child's reputation online belongs to everyone.

As a result of our research, events, and expertise, we believe the key to ensuring that children have safe, productive and positive experiences on the Internet is to build a culture of responsibility online. This applies equally to safeguarding their reputation. It is vital that six separate entities work together to create a safer

⁸ Family Online Safety Institute. *Good Digital Parenting*. "Clean Up Your Digital Footprint." Online at <https://www.fosi.org/good-digital-parenting/clean-your-digital-footprint/>

⁹ Family Online Safety Institute. *Good Digital Parenting*. "Are You Sharing More Than Your Kids Online?" Online at <https://www.fosi.org/good-digital-parenting/are-you-sharing-more-your-kids-online/>

¹⁰ Family Online Safety Institute. *Good Digital Parenting*. "Improving Your Online Reputation in Time for Graduation." Online at <https://www.fosi.org/good-digital-parenting/improving-your-online-reputation-time-graduation/>

¹¹ Family Online Safety Institute. *Good Digital Parenting*. "Teach Parents Tech – Digital Reputation" Online at <https://www.fosi.org/good-digital-parenting/teach-parents-tech-digital-reputation/>

¹² Family Online Safety Institute. November 2015. *Parents, Privacy & Technology Use*. Online at <https://www.fosi.org/policy-research/parents-privacy-technology-use/>

Family Online Safety Institute. November 2014. *Parenting in the Digital Age: How Parents Weigh the Potential Benefits and Harms of Their Children's Technology Use*. Online at <https://www.fosi.org/policy-research/parenting-digital-age>

Family Online Safety Institute. November 2013. *Teen Identity Theft: Fraud, Security, and Steps Teens Are Taking to Protect Themselves Online*. Online at <https://www.fosi.org/policy-research/teen-identity-theft/>

¹³ Family Online Safety Institute. November 2015. *Parents, Privacy & Technology Use*. p. 19.

¹⁴ Family Online Safety Institute. November 2015. *Parents, Privacy & Technology Use*. p. 23.

¹⁵ Family Online Safety Institute. November 2015. *Parents, Privacy & Technology Use*. p. 22.

Internet. The key components are: 1) government; 2) industry; 3) parents; 4) law enforcement; 5) teachers; and 6) children.

Building of Culture of Responsibility

Reasonable government support and oversight are essential components of this approach. An atmosphere of cooperation needs to be created amongst stakeholders. Cross-sector bodies, such as UKCCIS,¹⁶ bring together industry, non-profits, civil servants and ministers from government departments, educators, health professionals and researchers to develop strategies to counteract online challenges and emerging issues. Uniting relevant government departments also allows for consolidated governmental policies and approaches, rather than endowing just one person, or office, with total responsibility and power. The OPC can raise awareness about online privacy and reputation resources so that Parliamentarians can help spread the word and educate their constituencies. The government can also work with other parties to develop and distribute additional resources to help inform consumers.

Role of Industry

Effective oversight of industry self-regulatory efforts allows for maximum innovation and development of creative solutions, while ensuring that industry continues to raise the bar in the field of online safety and privacy. As part of this, FOSI encourages robust and comprehensive industry self-regulation and cooperation, incorporating topics such as privacy, reputation, and responses to take-down requests from users.

FOSI has seen a significant increase in recent years of technology companies and social media platforms offering more robust tools to help kids and families take more control over their digital reputation. Many have formed safety advisory boards, which bring in outside experts to advise companies on a multitude of safety issues, including privacy settings. Some of the best practices to help people deal with their online reputation and privacy include the creation of safety centers, privacy checkups and options for customizing who can view profiles and online content. It is especially helpful when companies provide periodic reminders to consumers to review their settings.

In 2014, for example, Facebook unveiled a “Privacy Checkup” tool to help users review their privacy settings.¹⁷ In addition to running the checkup, Facebook provides advanced privacy controls so that users can review tags and limit audiences. Information about managing privacy settings is available in both the Facebook Help Center and Facebook Safety Center so that users can easily find instructions on how to use the tools and customize the content that others see about them to limit sharing if desired.

Last year, Google created a My Account tab with useful resources to help users manage their visibility and take more steps to protect their privacy.¹⁸ This includes a “Privacy Checkup” to review settings and adjust preferences. YouTube provides options for users to change settings on the videos they post so that videos can be public, private, or unlisted.¹⁹ This allows people to share a video while limiting whether it appears on their YouTube channel or in search results and helps manage the audience.

¹⁶ United Kingdom Government. *UK Council for Child Internet Safety*. Online at <https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis>

¹⁷ Facebook. September 2014. *Privacy Checkup is Now Rolling Out*. Online at <http://newsroom.fb.com/news/2014/09/privacy-checkup-is-now-rolling-out/>

¹⁸ Google. *My Account*. Online at <https://myaccount.google.com>

¹⁹ YouTube. *Change the Privacy Settings for Your Video*. Online at <https://support.google.com/youtube/answer/157177?source=gsearch&hl=en>

Twitter offers a “Safety Center”²⁰ which provides tools and instructions for users on how to control both what they see from others and “controls over what others see about you.” This allows users to customize how much information they share, including how to limit photo tagging and protected tweets. Additionally, Twitter recently announced the formation of a “Trust and Safety Council,”²¹ including FOSI, to consult on tools and policies under consideration by the company.

The aforementioned examples are just some of the steps that the leading technology companies are taking to ensure that users have ultimate control over their online identity. FOSI strongly recommends that newer companies working in the online space follow industry best practices and develop robust tools to help users take control over their experience and reputation. FOSI also encourages platforms to educate users and increase awareness of privacy checkups, tools, and settings.

Engaged and knowledgeable parents are vital to ensuring that children have a safe online experience. Providing and encouraging the use of online safety and privacy tools is a community-wide effort and each player in the online safety ecosystem can play a role in helping parents and kids to learn about and embrace the tools available to them. The resources offered by FOSI’s Good Digital Parenting initiative²² are just one example of the support that is available for parents as they navigate the online world with their kids.

Law enforcement must be fully resourced and given the tools and training to combat the rise in cybercrime. These crimes include attacks on an individual’s reputation through the posting of intimate images without content, also known as revenge porn, sharing personal information of another person with intent to cause harm, and identity theft. Law enforcement should be educated on the issues, and use their position to raise awareness and develop solutions to criminal activity.

Teaching Kids the Skills to Protect their Online Reputation

Superior technology training must be provided to all teachers. This will enable them to incorporate digital citizenship teaching across the curriculum, helping children navigate the online world safely and to create positive online reputations at school which will, in turn, provide them with the skills to operate in an increasingly technical world.

Ideally, resilient and informed children would make wise personal choices about the information they share about themselves, the content they post about others, and the way in which they interact publically on the Internet. It is vital to teach children both media and digital literacy, with attention to the importance of their online reputation, both now and in the future.

The Commission’s discussion paper invites responses to address the right to be forgotten and the Californian law “Privacy Rights for California Minors in the Digital World.” FOSI appreciates the intent of lawmakers who consider these approaches to keep children safe online, however we are not supportive of the idea. The approach raises significant questions about freedom of speech and expression, and the role of companies in deciding what information to remove. The global nature of the Internet makes any attempts to limit content accessed in a particular territory extremely difficult, and thus the effectiveness of these rules is brought into question.

Furthermore, we believe that the message that content can be removed or taken back is wrong. Rather than giving children an unfettered option to remove material from the Internet, to the extent that that is even possible, they should be taught to think before they post. Kids must consider the implication for themselves

²⁰ Twitter. *Safety Center*. Online at <https://about.twitter.com/safety>

²¹ Twitter. *Trust Safety Council*. Online at <https://about.twitter.com/safety/council>

²² Family Online Safety Institute. *Good Digital Parenting*. Online at <https://www.fosi.org/good-digital-parenting/>

and for others before they post a photo, comment on a story, or send a Tweet. They should be taught to use the tools and settings already available to help them manage their own content and reputation.

Currently, the majority of online services provide for the removal of personal information shared inadvertently, or ill-advisedly, by the person who posted it. Furthermore, many platforms also allow for users to request the take-down of intensely personal information such as addresses, financial information and intimate images posted by a third-party.

When assessing potential responses to online safety and privacy challenges, FOSI encourages the OPC to consider the risks, harms, and rewards of children's online lives. Without a doubt there are risks with the sharing of personal data and the repercussions are in the newspapers almost every day. The harms are very real; financial, personal, and professional. However, the rewards of being online arguably outweigh these factors.

Through FOSI's research and Good Digital Parenting presentations, we have heard from parents about the many benefits of their kids being online and even the positive examples resulting from teenagers having a digital footprint. Children connect and communicate with distant relatives, learn skills that will help them with careers in the digital age, use technology to express creativity, and use some online platforms to showcase their talents. In our research last year, FOSI found that 78% of parents believe that their child's technology use has a positive impact on his or her future, career, and life skills, and 64% think it positively affects his or her creativity.²³

Recommendations

FOSI recommends that the OPC works with all stakeholders to find solutions to help Internet users manage their digital reputation. Government, industry, schools, parents, and organizations should educate users to think before they post and consider the impact of online content on their reputation on and off-line.

Technology companies should look to existing industry best practices to create robust technical settings to increase user control. Online platforms should provide educational messaging to help users determine how much and with whom they want to share their information. Companies already offering these features should remind people of the existence their tools and promote their usage to help lessen the risk of online reputational harms.

The OPC should conduct research to examine how people think about online privacy with particular attention to teenagers and online reputation. Research should serve as a foundation for creating policies and developing education in order to reach all populations. Furthermore, the OPC should also ensure that resources and materials are available in multiple languages for a variety of comprehension levels and develop an effective distribution strategy to reach families across Canada.

While FOSI acknowledges the potential for mistakes to be made online that adversely affect a child's reputation, we encourage the OPC to recall that the Internet presents a vast number of opportunities to create a positive reputation online, and that should not be forgotten. Children and teenagers are able to develop charity campaigns, showcase talents, and share knowledge to an unprecedented degree. Any proposed changes to legislation and practice should strive to ensure that these positive aspects of online life are not unnecessarily adversely impacted.

²³ Family Online Safety Institute. November 2015. *Parents, Privacy & Technology Use*. p. 9.