

January 31, 2016

Dear Members of the ITU Council on Child Online Protection (CWG-COP),

Facebook welcomes this consultation on the Child Online Protection (COP) Results Framework, which aims to set global goals and targets on child online protection. We consider the safety of the people who use Facebook our most important responsibility and we appreciate this opportunity to engage with the CWG-COP on the critical issue of child exploitation.

Facebook has zero-tolerance for child exploitation and child exploitation images (CSE) and aggressively fights against its proliferation, working closely with child protection authorities to thwart this criminal behavior. We have long used PhotoDNA technology to scan all photos uploaded to our platform and automatically detect known illicit child exploitation images. When an illegal image is detected, the responsible account is immediately suspended, and the incident escalated for referral to the appropriate child protection authorities.

Facebook works closely with relevant child protection authorities worldwide, including the National Center for Missing and Exploited Children (NCMEC) in the United States, WePROTECT, the Child Exploitation Online Protection Centre (CEOP), the Internet Watch Foundation (IWF), and Interpol. We also cooperate with NGOs worldwide that are engaged in anti- human trafficking work.

We support policies and legislation aimed squarely at prosecuting those who create or distribute child exploitation images—on or offline; and we encourage authorities worldwide to take advantage of the NCMEC reporting and cybertip frameworks and to draft local laws prohibiting the exploitation of children.

In furtherance of Facebook’s longstanding efforts to fight child exploitation and thwart the proliferation of CSE, Facebook has joined the International Advisory Board of WePROTECT — a global multi-stakeholder initiative to combat CSE.

We commend the ITU for acknowledging the work already being done globally to address this issue, such as the work of WePROTECT; and we commend the ITU's commitment to incorporate that into their assessments. *“The work and impact of regional and international initiatives (which have already set in place monitoring and reporting mechanisms) will be reflected in this framework...”*

We especially welcome the Global targets aims to: *“improve cooperation both at the national and international,” “align global investments towards achieving the common vision level,”* and *“reduce the overlapping/duplication of work.”* Near the end of last year, WePROTECT and the Global Alliance Against Child Sexual Abuse Online, a joint initiative by the European Commission and the United States, combined efforts for just these reasons, and we would urge the members of the ITU Council on Child On-line Protection to focus on aligning and uniting all global efforts as this will help us have a greater impact and avoid duplicative work.

We also welcome the framework's presumption of a multi-stakeholder model for coordination and dissemination of good practices. We have found a multi-stakeholder approach allows for greater impact with all partners focusing on their strengths. For example, at the European level, Facebook has joined with other industry players and the European Commission to achieve real progress in online safety as part of the CEO Coalition for a Better Internet for Children. The goal of the Coalition is to bring together industry leaders from across the technology sector to exchange best practices and deliver concrete actions on five objectives (reporting mechanisms, age-appropriate privacy settings, content classification, parental controls and effective take down of child abuse material). Facebook led the work on ‘age appropriate privacy settings’ and co-led the reporting mechanisms work with Telefonica and Google. In our experience, these multi-stakeholder models of coordination and spreading good practice are the most effective way to enhance the online safety of young people because they allow each sector - government, industry and child safety groups - to focus on their strengths.

Finally, the framework notes, “*At this stage, due to the lack of relevant data, we have set specific targets only related to legislation and reporting mechanisms.*” In both instances, we urge the ITU to support and employ a multi-stakeholder approach to achieving these goals.

We have long supported policies and legislation aimed squarely at prosecuting those who create or distribute child exploitation images—on or offline; and we encourage authorities worldwide to draft local laws prohibiting the exploitation of children and to take advantage of the NCMEC reporting and cybertip frameworks. At the same time, we are mindful of occasional efforts to use such legislation as a vehicle to grant broad access to users’ metadata and content, to establish wide-reaching censorship regimes, or to impose restrictions on the use of specific technologies. Such efforts do not squarely focus on the criminal behavior and undermine the extraordinary global multi-stakeholder collaboration taking place to shut down the proliferation of CSE.

We also urge a multi-stakeholder approach to establishing reporting mechanisms to ensure the mechanisms account for the differences in technologies of various platforms as well as the capacities and capabilities of other stakeholders. Just as “*The overall framework is flexible and variable thus can be changed in accordance with the evolution of Child Online Protection issues,*” reporting mechanisms need to be flexible and variable to account for the differences in platforms and the evolution of technologies. Overly prescriptive efforts cannot address the technological differences of each platform or change as rapidly as technology does. We would urge a multi-stakeholder approach that seeks to put reporting mechanisms in place but allows industry the flexibility to develop them in accordance with the tech capabilities of their platforms and gives organizations the flexibility to develop programs that take into account capacities and capabilities, which brings us to our conclusory note.

In conclusion, we would like to emphasize the importance of building capacity and capabilities at the national level. The success of these efforts requires that all stakeholders have the resources needed to fulfill the mission at hand. It is only by bringing together and supporting all those with a responsibility to protect children that we can get results. This must especially be done at the national level, where numerous agencies and players interact such as law enforcement agencies, the courts, those responsible for educating and safeguarding children and their families, and the companies that make the online world possible.

We hope this response is helpful to the ITU Council on Child On-line Protection and we thank you for inviting this consultation.

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