

Mark Zuckerberg
CEO
Facebook
1601 Willow Road
Menlo Park
CA 94025
USA



Friday, 15th October 2021

Dear Mr Zuckerberg

Facebook's approach to child protection and well-being

As a coalition of child protection organisations and experts from across the world, we are writing to express our significant concerns about Facebook's approach to protecting children from avoidable harm and abuse, including as a result of the company's commercial decisions and design choices.

The recent disclosures made by Frances Haugen and reported in the Wall Street Journal raise substantive questions about how Facebook identifies and responds to reasonably foreseeable risks across Facebook, WhatsApp and Instagram.

We strongly welcome Facebook conducting research to understand the impact of its design decisions on users, and recognise that this should form a crucial part of the approach to risk identification and mitigation by online platforms. However, by any measure, it is difficult to determine that the range of commercial and product decisions taken by the company to improve children's safety and well-being in recent years in any way correspond to the magnitude of the issues highlighted by your own research, nor the extensive evidence of actual harm gathered by the signatories of this letter.

In your Vice President of Global Affairs Nick Clegg's recent blog post, he provided welcome reassurance that *'Facebook understands the significant responsibility that comes with operating a global platform. We take it seriously, we don't shy away from scrutiny and criticism. But we fundamentally reject this mischaracterisation of our work and impugning of the company's motives.'*

As a child protection community, let us be clear that Facebook has an industry leadership role to play. In Q2 2021, Facebook removed 25.7 million items of child sexual exploitation content. In the UK, Instagram now accounts for one-third of all grooming offences, where the platform used is known. A review of more than 350 child trafficking cases prosecuted in the United States found that less than 9% were initiated because Facebook reported them.

But the company must do significantly better to regain the trust of parents and child protection professionals, and most importantly, to ensure its product decisions contribute to rather than compromise children's safety and well-being.

This is a valuable opportunity for Facebook to demonstrate it understands the severity of harm on its services, and to reset its approach to transparent, open and constructive engagement with child protection organisations, regulators and civil society. We cannot continue with a situation in which children's needs are or appear to be secondary to commercial motivations, and in which young people's right to safety, privacy and well-being is traded-off to prioritise the interests of adults and other more influential drivers.

We believe that Facebook can demonstrate its commitment to children through taking five concrete steps. Each of these measures provide Facebook with an opportunity to demonstrate that it

understands the legitimate and substantive concerns about its approach to child protection, and that it intends to act with more transparency, integrity and a clear commitment to taking more child-centred product and design decisions in future.

We specifically call on Facebook to:

1. **Share its full research on children's mental health and well-being, and grant access to its data to independent researchers, civil society organisations and regulators:** the reported findings of Facebook's research into the negative mental health impacts of Instagram are hugely concerning. Reports suggest that your research finds that one in eight UK teenage girls who have experienced suicidal thoughts self-report this relates at least in part to their usage of Instagram.

Although Nick Clegg has described the findings as *'deliberately lop-sided'*, the reality is that child protection experts should be able to judge for themselves. For that reason, we ask you to publish all relevant data on the impact of Facebook's services on children's mental health, and to do so in full.

More broadly you correctly state that *'research into the impact social media has on people is still relatively nascent and evolving, and that we need to rely on an ever-growing body of multi-method research and expert input.'* To that end, Facebook should develop a clear unambiguous strategy to provide access to its data sets across a wide plurality of independent researchers, child protection organisations and its regulators.

We cannot build an appropriately nuanced and evidence-based assessment of the risks and benefits of Facebook's services without it, and providing only selective evidence to datasets risks undermining confidence (and indeed raises concerns about the potential for a misleading or highly partial picture to be created.)

2. **Set out what research has been conducted on how Facebook's services and design choices contribute to child sexual abuse, and publish the findings:** while recent concerns have largely focused on the mental health impacts of children using Facebook's products, there are also substantive questions about what research has been undertaken to determine how Facebook's design choices contribute to the growing scale and complexity of child sexual abuse, including the production of self-generated images and grooming.

Facebook has a substantive industry leadership role to play to proactively detect and disrupt abuse; disrupt well-established grooming pathways that start on its services; and to ensure its sites are made fundamentally safer-by-design. Facebook should share information about what research it has conducted, which design choices have been identified as problematic, and what if any design changes have been made as a result.

3. **Publish Facebook's risk assessments:** we fully agree with Mr Clegg's assessment that it *'would be really worrisome if Facebook didn't do this sort of research in the first place'*. However, the most concerning aspect of Frances Haugen's disclosures is that once this research was undertaken, it appears there was a wholly insufficient response to fix the issues it raised and the data was not shared publicly.

It is essential that Facebook has an effective risk identification and mitigation strategy in place, but recent allegations reinforce our concerns about its overall effectiveness. One way in which our concerns could be addressed is through publishing the data protection impact assessment which you have recently produced to comply with the UK Children's Code.

Given that the Code requires Facebook to assess the specific risks of its services, and mitigate risks including but not limited to online grooming; harmful and inappropriate content; social anxiety, self-esteem issues, bullying and peer pressure, it is reasonable to conclude all such risks were subject to detailed research, and that these are captured in the impact assessment (along with a detailed sense of which design changes were required and made.)

4. **Provide transparency on Facebook's product reputational reviews:** The Wall Street Journal has reported that Facebook has put on hold work on new and existing products to conduct 'reputational reviews'. These will examine how Facebook may be criticised, and to ensure products don't adversely impact children. In a blog post last week, you said: *'I spent a lot of time reflecting on the kinds of experiences I want my kids and others to have online, and it's very important to me that everything we build is safe but good for kids.'*

While we welcome the decision to proceed with a review, we invite you to share more information on the objective, timings and scope of the reviews. In particular, we encourage you to be transparent about what criteria you intend to use to assess the impact of future product changes on children; whether this will be conducted and reviewed at Executive Board level; and which independent child safety organisations were consulted on the criteria, and will be invited to participate in the work.

5. **Review the child protection implications of end-to-end encryption:** we would particularly welcome clarification on whether the proposed rollout of end-to-end encryption is one of the product changes in scope of the reputational review.

Many of the signatories to this letter first wrote to you in February 2020 setting out our significant concerns about the impact of proceeding with end-to-end encryption before technical mitigations were developed and put in place. We reiterate our request that Facebook seeks to better balance the range of fundamental rights at stake, including children's safety and privacy, and that the company only proceeds once it can demonstrate that children's safety and well-being will not be compromised.

We were disappointed that Facebook's Board of Directors recommended shareholders voted against a proposal at this year's Annual General Meeting to assess the potential adverse impacts of proceeding with end-to-end encryption on children and young people, and on the company's reputation and social licence.

We call on you to reconsider this position. Facebook's responsibility should be geared towards protecting the needs of children and young people using its services, and an independent and transparent review would enable the company to take product decisions that demonstrably consider the best interests of children and young people; demonstrate a clear and unambiguous commitment to child safety; and build an awareness within Facebook that its welcome adoption of a human rights-based approach to product decisions is cognisant of one in three of global internet users being children.

We look forward to your constructive engagement on our concerns, and would be delighted to meet with you at the earliest opportunity to discuss them.

This letter is copied to Nick Clegg, VP of Global Affairs.

Yours Sincerely,

The undersigned child protection organisations and experts from around the world:

- Professor Warren Binford, W.H. Lea for Justice Endowed Chair in Pediatric Law, Ethics & Policy – University of Colorado (Affiliation for Informal Purposes Only)
- John Carr, OBE – Children's Charities' Coalition on Internet Safety
- Professor Julia Davidson OBE – Child Protection Expert
- Professor Hany Farid – University of California, Berkeley
- Professor Sonia Livingstone OBE, FBA, FAcSS, FBPS, FRSA – London School of Economics and Political Science
- Dr Elena Martellozzo, Associate Professor in Criminology – Middlesex University, Centre for Abuse and Trauma Studies
- Abhilash Nair, Senior Lecturer in Internet Law – Aston University, Birmingham
- Dr Michael Salter, Scientia Associate Professor of Criminology – University of New South Wales Sydney



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