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Who is in favour of harming children?

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I. List of acronyms

DG	Directorate-General
EC	European Commission
EU	European Union
Infosoc	Information Society and Media
NGO	Non-governmental organisation
SNS	Social Networking Service
SSN	Safer Social Networking

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1. Introduction

“I have heard and read here and there, that Brussels intends to regulate the Internet, to introduce new red tape. Frankly, this is nonsense! Never ever has the Commission had such a foolish idea! But let me ask you some questions: who in this room is in favour of child-pornography on the new media? ... It is the duty of the Commission to propose a framework under which these shared European values are protected. But I have no intention to ‘regulate the internet’!” - European Commissioner Viviane Reding (Reding 2005).

Suppose there is a problem. Not just a problem, but a problem where a public interest is at stake. A public interest that can be harmed in such a way that government intervention could be justified. What would be the best way to solve this problem: formal legislation or self-regulation?

This paper essentially analyses that question. However, the field in which I analyse this question is a rather distinct one: self-regulation on the internet. The rapid development of the Internet and other information and communication technologies has given rise to a completely new economic sector (European Commission 2008). Although this sector contributes considerably to economic growth in Europe, it also has a negative side which can lead to considerable harm to the most vulnerable: children. Some of those changes have already led to new and – according to some - severe risks for children. Social networking sites – such as Facebook, MySpace and Bebo – combine diverse actions and functions which were done separately in the past. Children intensively use those social network sites, which confronts them with a series of new risks. Not only can they be a potential threat for each other (for example through online bullying), but also is there a risk that adult abusers use those social networks to illegally target children (for example in cases that are related to child pornography).

Those new developments have not gone unnoticed by the Commission. Under its “Safer Internet Programme” – which started already in the 1990s - the Commission has launched various initiatives to improve the online safety of children. In the relatively short history of internet governance, self-regulation has evolved as one of the main tools used by governments to address online issues, and the Commission is no exception to this. Thus, in 2008 the Commission launched an self-regulation initiative under its Safer Internet Programme, in which it encouraged stakeholders to come together in order to develop a set of principles that would protect children as they are using social network sites: the Safer Social Networking Principles.

In public, nearly all stakeholders hailed the Commission’s initiative for self-regulation. And when reading through the public statements of the last few years, little criticism on the Principles can be found. However, one only needs to look at the amount of anonymous quotes in this paper in order to understand that this is a very sensitive issue. This sensitivity is related to the fact that the

protection of children is an issue where no stakeholder wants to go against. However, the question that remains is: have the principles really made a difference?

The evaluation of the principles that is recently released assesses the extent to which the participants have implemented the principles correctly. What it does not do however, is assessing the extent to which the choice for self-regulation has been the right one. This is an important question, as the commission could also have chosen to devote those resources to other initiatives, for example to existing initiatives such as awareness campaigns, or new initiatives such as promoting formal legislation (either at the national level or – if possible – at the European level). In this paper, I try to address this issue by focussing on the following question:

„To what extent have the EU’s efforts in creating the Safer Social Networking principles through self-regulation been an efficient way for achieving the overall policy goal of promoting a safer online environment for children?“

In order to be able to answer this question, I will conduct a case study of the Safer Social Networking principles in which I perform a cost-benefit analysis from a societal perspective. I will compare the option of self-regulation with the option of formal regulation.

Before getting to the case study however, it is important to understand the way in which self-regulation works. Therefore, chapter 2 focuses on self regulation as an EU policy tool. In chapter 3, I will zoom in on the role that self-regulation has played in internet governance. This is particularly important, as it will become clear that there are specific reasons why self-regulation is a preferred instrument for regulation of online activities. Chapter 4 consists of the case study, and in chapter 5 I will reach a conclusion in which I will try to give an answer to the main question.

2. Self-regulation as an EU policy tool

2.1 Introduction

The commission has identified self-regulation as an important tool to increase the level of protection for children that are using online social networks.¹ In order to understand the possibilities and limits of this ‘policy tool’², it is important to start off with a closer look at the concept of self-regulation itself. In this chapter I will do so by further defining it and assessing its strengths and weaknesses. Also, I will take a closer look at the role that self-regulation has played in the EU so far.

2.2 A definition of self-regulation

Self regulation can be seen as an alternative to so-called command-and-control regulation. The essence of command-and-control regulation is the exercise of influence by imposing standards backed by sanctions (Baldwin and Cave 1999, 35). In our complex information society however, it is no longer possible for governments to exercise influence and control over the behaviour of citizens and companies by merely setting up central rules and regulations. Therefore, it is not always necessary that government bodies must make all the rules and see to their implementation. Often it will be sufficient for the legislature to provide a framework for self-regulation by the industry (Eijlander 2005).

The European Commission uses self-regulation as well. In its Inter-institutional Agreement on Better Law-making, the Commission defines it as follows:

“Self-regulation is defined as the possibility for economic operators, the social partners, non-governmental organizations or associations to adopt amongst themselves and for themselves common guidelines at European level (particularly codes of practice or sectoral agreements).” (European Commission 2003, 3)

As this definition covers the concept rather well – especially in the European context – I will adhere to it in this research paper.³

Within this definition of self-regulation, various forms of it can be distinguished. Millwood-Hargrave (2007) graphically represents the various forms of regulation on a continuum from state regulation to self regulation, as represented in figure 1 (Millwood-Hargrave 2007). We can identify self-regulatory arrangements that vary from non-binding norms of action, process and behaviour

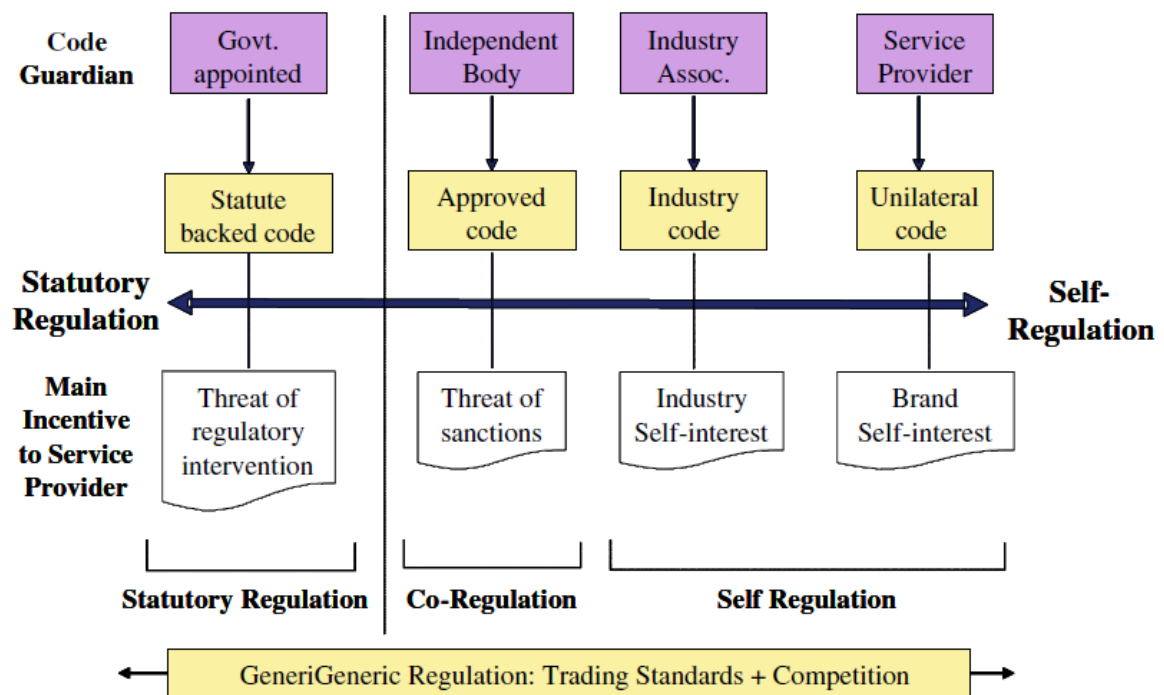
¹ “Promote national frameworks aimed at achieving a comparable and effective level of protection of minors, by setting out guidelines for the development of national self-regulation” (European Commission 2006)

² One might also argue that self-regulation is not a ‘policy tool’, as it involves exactly the replacement of policy by self-regulation. However I argue that in this context the choice of the Commission to stimulate self-regulatory initiatives can also be regarded as ‘policy’.

³ It might be obvious that many other definitions can be given, however that theoretical discussion does not fit within the scope of this paper. For a more detailed discussion on this, see Kleist and Palzer (2007).

(unilateral code), to formally binding legislation (statute backed code). In the EU, examples can be found of all the forms below.

Figure 1 Millwood-Hargrave Diagram of Regulatory type and incentive structure (based on Marsden, 2008)



2.3 Strengths and weaknesses of self-regulation

From a public policy perspective, self-regulation can offer several advantages over government regulation or legislation. It often is more prompt, flexible and effective than government regulation. As Pitofsky states:

"Self-regulation can bring the accumulated judgement and experience of an industry to bear on issues that are sometimes difficult for the government to define with bright line rules. Finally, government resources are limited and unlikely to grow in the future. Thus, many government agencies [...] have sought to leverage their limited resources by promoting and encouraging self-regulation." (Pitofsky 1998)

The advantages and disadvantages of self-regulation compared to formal regulation are shown in the table below. The advantages and disadvantages mentioned in this table will also be used in the cost-benefit analysis of the SSN principles that I will conduct in chapter **Fout! Verwijzingsbron niet gevonden..**

Table 1 Advantages and disadvantages of self-regulation compared to formal legislation (de Nooij and Theeuwes 2003)

Advantages of self-regulation	Disadvantages of self-regulation
<ul style="list-style-type: none"> • More and better information within the sector • Self regulation is cheaper • Better incentive and willingness to comply • More flexible • May happen without government intervention • Less pressure on civil service 	<ul style="list-style-type: none"> • Possible limitation of competition • Possible infringement on legal certainty • Sensitive for lobbyism • Possible pre-emptive effect (path-dependence) • High costs of meta-supervision (self-regulation is harder to supervise)

So the advantages of self-regulation for the government are rather clear. Then what are the motives for the industry to participate in self-regulatory initiatives? Various motives can be found in the literature on this, including the ones mentioned in the table below. But even though self-regulation has those advantages, it is not always hailed by industries. Their doubts about self-regulation may be explained by a path-dependence perspective.

As Kleist and Palzer (2007) point out, the willingness of the industry to start with self-regulation partly depends on what the starting point was. Where prior to considering self-regulation there has been formal regulation or co-regulation, self-regulation may come as a form of liberalisation and is more likely to be applauded by the industry. On the other hand, where no voluntary self-regulation existed, the industry might feel threatened and see self-regulation as a first step towards more formal regulation, which could hamper their freedom to operate (Kleist en Palzer 2007).

Industry motives for self-regulation
<ul style="list-style-type: none"> • Raising industry standards • Marketing tool • Enhance level of information • Avoid government regulation • Meet legislative requirements • Combination of the above factors

In the end, it can be concluded that self-regulation can offer significant benefits for both the industry and policy makers. Nonetheless, the exact advantages and disadvantages have to be determined on a case-by-case basis.

2.4 Self-regulation in the EU: the “Better Regulation”-initiative

In the 2001 White Paper on European Governance (European Commission 2001), the Commission emphasized the need for a “more effective and transparent consultation at the heart of EU policy-shaping” through what we might now term “multistakeholder governance” (Marsden 2008, 118). This resulted in the Inter-Institutional Agreement on Better Law-making (European Commission 2003). In this document, the commission imposed certain limits to alternative modes of regulation, by requiring that:

“any use of co-regulation or self-regulation is always consistent with Community law and that it meets the criteria of transparency (in particular the publicising of agreements) and representativeness of the parties involved. It must also represent added value for the general interest. These mechanisms will not be applicable where fundamental rights or important political options are at stake or in situations where the rules must be applied in a uniform fashion in all Member States.” (European Commission 2003, 3)

When it comes to self-regulation, the Commission also states that “this type of voluntary initiative does not imply that the Institutions have adopted any particular stance, in particular where such initiatives are undertaken in areas which are not covered by the Treaties or in which the Union has not hitherto legislated” (European Commission 2003).

In 2002, the Commission mentioned self-regulation as one of the appropriate legislative instruments and indicated that it could consider it preferable not to make a legislative proposal, but to stimulate the coming into being of self-regulation:

“[The commission] can also suggest, via a recommendation for example, that this type of agreements be concluded by the parties concerned to avoid having to use legislation, without ruling out the possibility of legislating if such agreements prove insufficient or inefficient” (European Commission 2002).

Thus, there is an extensive body of documents in which the Commission emphasized the potential of self-regulation, and regulated its use. One area where the Commission has actively used self-regulation as an instrument, is internet governance. In the next chapter, I will have a closer look at the role of self-regulation in internet governance, and the activities of the EU in that regard.

3. Self-regulation for a Safer Internet

3.1 Introduction

“The internet does not change everything, including the nature of the nation state, but does create the conditions for new and more globalised problems and solutions to emerge, based on – or at least extending from – the nation-state governance model” (Goldsmith and Wu 2006)

On a global level, self-regulation has traditionally been the primary policy tool for the internet. This can be explained by some unique characteristics of the internet, such as its international scale and de-centralized nature. In order to make a sound analysis of the question whether self-regulation is an efficient policy-tool for increasing the safety of social networks, it is crucial to take these characteristics into account. This chapter will therefore zoom in on the advantages and disadvantages of self regulation in the internet-sector.

3.2 Self-regulation and the unique characteristics of the internet

“Internet governance can be understood as an open-ended, collective process of searching which aims to fill a global ‘regulatory void’ both conceptually and institutionally in a legitimate way. This void arose because the principle of sovereignty, which was an essential component in international regulation of the telephone network, has not been carried over to the internet.” - MacLean (2004, p.99).

Existing political and business models are coming under severe threat in an increasingly interconnected world that responds in fundamentally different ways than it did when existing institutional arrangements were developed. As a result, some argue that it is inappropriate to preserve existing divisions between public-sector, private-sector, and civil-society institutions, issues or responsibilities (Marsden 2008). This issue of governance on the internet has been widely debated. For the EU, as well as for other international organisations such as the UN, governance on the internet has posed unique policy dilemma’s. In 2004, the UN established a Working Group on Internet Governance, which stated that internet governance is neither an intergovernmental nor a technical or market-led phenomenon. In fact, it is all of these but also and critically involves the internet user (Marsden 2008). When it comes to regulation of online content, non-binding declarations and recommendation are used a lot more than traditional statute and case law. The uses of “soft law”, “soft-power” and non-legal solutions such as common principles are well-known

in the context of internet-development.⁴ In the EU, the use of such solutions are often based on the “Better Regulation” initiative that was discussed in the previous chapter.

There are particular factors that make internet content harder to regulate than traditional media, and in general more appropriate for self-regulatory solutions. Those factors are shown in table 2. Self-regulation is faster and more flexible than government regulation. In a sector that is particularly hard to regulate, such fast and flexible regulation is essential to quickly adapt to changing circumstances.

Table 2 Five reasons why internet content is hard to regulate (Marsden 2008, adapted by author)

Factor or regulatory interest	Internet examples
“Glocalization” of self-regulation	Global problems with “local” enforcement – even to individual social networks
Shifting alliances between government, industry groups and users	Government commitment to role of self-regulatory solutions
Strength and pluralism of civil society stakeholders	Difference between early adopters and newbies (late adopters in mass markets)
Growth of user-generated content	Facebook, YouTube, Hyves, LinkedIn
Converging corporate interests	From telephony, computing, content, games, etc.

3.3 The EU Safer Internet programme

Both in the academic world and within the commission, there was consensus that action was needed for better online protection of children and minors. The EU established its Safer Internet Programme in order to deal with this issue. Policy required multiple actions, including changes to legislation, self-regulation by the industry, raising awareness of the associated risks, and application of privacy enhancing technologies.

According to the commission those actions should be supported by all stakeholders (see table) that are involved. As represented in figure 1, industries and businesses have the technical and organisational capacity to chance products, services and processes.

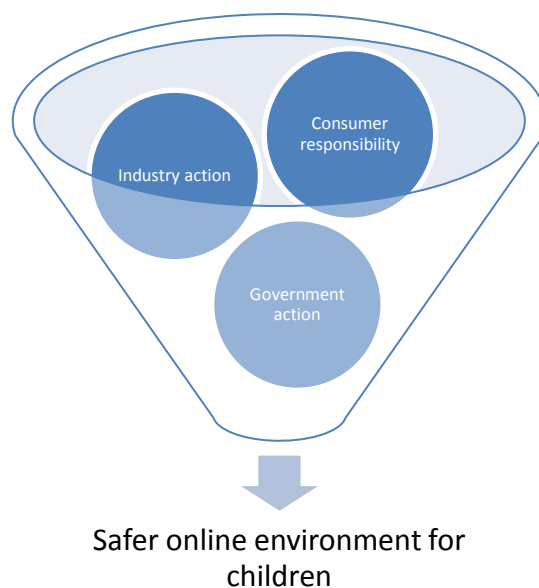
Stakeholders in online protection of children

- Online Service Providers
- Governments
- Parents
- Teachers
- Users
- NGO’s

⁴ “Soft law” has a specific meaning in European law as a non-binding legal instrument that is followed as a matter of informal practice by Member States, such as a Recommendation. The usages here is less specific, referring to any non-binding regulatory direction issued by inter-governmental organization, government agency or ministry (Marsden 2008, 117).

Governments have the power to regulate areas of life and business. Parents can take responsibility as well, for example by better protection of home computers.

Figure 2 Actions for a safer online environment for children



3.4 Self-regulation within the Safer Internet Programme

In 2008, the commission concluded that self-standing self-regulation initiatives from the industry were not likely to happen and that past experience had shown that public intervention is needed to launch and stimulate such a process (European Commission 2008, 40). Market forces alone were not expected to lead to appropriate self-regulatory initiatives. Therefore the Commission started looking for possibilities to stimulate such initiatives.

In its impact assessment of the multiannual community programme on protecting children, the commission states that “self-regulation would definitely not tackle all the risks and challenges by itself” (European Commission 2008, 25). According to the Commission, self-regulation can be part of the solution but within given limitations only. Many of the issues in the field of internet safety go beyond the reach of industries and require participation of specific organisations such as schools or child care organisations. The commission also points out that for industry players the conflicting interests in the market may endanger the progress of the process.

A question that naturally arises is whether there is ‘added European value’ for action in this field. An anonymous representative of a social networking company confirms that there is added value in European guidelines: “even though in some countries there are well-developed guidelines, European guidelines give an opportunity to streamline efforts. Thus, in theory, this was a good initiative.”⁵ According to Drs. Remco Pijpers – director at “Mijn Kind Online” and expert in the field of Youth and Media – national solutions often produce better results than European action in this field. Reason for this is that there are many differences between European countries, and the distance between

⁵ See chapter 7 for a list of persons interviewed.

the policy makers in Brussels and national stakeholders is often too big. However Pijpers does think that Europe should be engaged in this issue, for example through oversight and evaluation of the principles at a European level.

Regulating the internet industry is problematic, as the internet is literally borderless. Therefore, rules are practically unenforceable. This also applies to the social networking industry, where the larger companies are all based abroad (primarily in California, USA). For the EU, this makes it very hard to regulate their behaviour. And considering the fact that companies themselves have a certain interest in creating guidelines the choice for self-regulation might even be the most logical one. As Luc Delany, European Policy Associate at Google states:

"Despite the big spotlight on the internet, people forget that most of these web service providers have only been around for a few years, are highly diverse and new one pops up every day. I think such young and fast moving Industry should really be praised for the amount of work it does in engaging with regulators and institutions that are often on another continent to the service itself. It shouldn't be forgotten of course that it is in the companies interest to protect its users of any age and compete on protection features too."

It might go a little bit too far to say that internet companies are all about protecting their customers and acting responsible, as in the end their main goal still remains making profit and at some points that might conflict with protecting minors. Nonetheless it is true that – especially regarding the SSN principles – the industry seems to have cooperated with the commission and other stakeholders fairly well. So given the fact that the EU has very limited legal powers to regulate foreign companies, self-regulation seems to be the best instrument.

However even if the EU can regulate certain behaviour, the necessity of regulation must be assessed. Mr. Delany states that regulation is not necessarily the best way of solving the issue of online safety:

"Regulation should only take place when there is a demonstrable market failure. We work to empower parents with tools to help them choose what content their children see online, educate families with tips on how to stay safe and help to protect through partnerships with charities, our industry and the government or regulators. There is a responsibility that lies with government to protect its citizens, a company to protect its clients and parents to protect their children, and all involved need to play their part."

It is up to the Commission to monitor very closely whether such market failures are present. This underlines once more the importance of a thorough evaluation of the principles. The evaluation that was presented in early 2010 only assesses the level of implementation of the principles, and gives no judgment about the extent to which they actually work. Here the difficulty of meta-supervision that was mentioned in chapter 2.3 plays an important role.

Having established the concept of self-regulation, its role in the EU, and its particular importance for the internet-sector and the online protection of children, I now turn to a specific case study of self-regulation in the internet sector: the Safer Social Networking Principles.

4. Case study: the Safer Social Networking Principles

4.1 Introduction

In the previous two chapters I have presented the concept of self-regulation and the relevance of self-regulation in the field of internet governance within the EU. In this chapter I will look closer at one specific example of an internet-related self-regulation initiative: the Safer Social Networking Principles. My goal is to examine the extent to which this initiative has been an efficient way of dealing with the policy problem that the Commission tried to tackle.

I will start with presenting the background of this EU initiative (chapter 4.2), and after that I will give an explanation of the methodology (chapter 4.3). In chapter 4.4 I will present my analysis, which is based on a study of relevant policy documents, literature and interviews with some of the main stakeholders. Finally I will present the conclusion of this case study in chapter 4.5.

4.2 Background: Social network sites and children

In the last decade, so-called social network sites have seen an enormous growth. Those sites – such as Facebook, Twitter, Bebo, Hyves, Myspace and many others – enable users to create a profile with personal information and then interact with each other. The provision of this personal information, however, makes users vulnerable to various risks such as identity theft, sexual assaults and other crimes. Children and minors are particularly vulnerable.⁶ As table 1 shows there are various online risks that might affect them (see table). Here the issues are related to the consent of parents and the presumed consent of the child.

For social networking services (SNS's) prevention of such crimes is a major problem. First of all certain measures might hamper the functionality of their sites, and may thus endanger their business model. Therefore companies are not always willing to regulate. But even in areas where there is broad agreement amongst the public opinion, regulatory environment, and the industry that measures are legitimate and necessary – for example child pornography - problems may arise due to the different legal regulations and interpretations and practical and technical problems (Marsden 2008, 123).

Online risks for children (European Commission 2006)

- exposure to harmful content
- incitement to inappropriate, harmful or risk-taking behaviour
- disclosure of personal information
- cyber-bullying
- advertising and high expenditure
- security risks, erroneous evaluation of information sources
- downloading leading to copyright infringement
- grooming
- specific risks related to mobile phone use
- health risks
- addiction

⁶ A Eurobarometer (2003) opinion survey on privacy showed that older people who had learnt to use the Internet were better aware of the risks to privacy. The younger generation – for whom the internet had become a natural habitat – had fewer such concerns.

Based on the self-regulation intentions of the Commission which were discussed in chapter 3.4, DG INFOSOC decided in 2008 that it was time to initiate the creation of a set of self-regulation principles for the Social Networking Services.⁷ As part of its Safer Internet Plus Programme, the European Commission gathered 18 of the major online social networks active in Europe as well as researchers and child NGO's to form a so-called European Social Networking Task Force to discuss guidelines for the use of social networking sites by children and young people. As a result "the Safer Social Networking Principles for the EU" were developed by social networking services providers in consultation with the Task Force (Staksrud and Lobe 2010, 10). The aim was to "provide good practice recommendations for the providers of social networking and other user interactive sites, to enhance the safety of children and young people using their services" (Safer social networking principles for the EU 2009). The guidelines were adopted voluntarily by the major online social networks active in Europe, and signed on Safer Internet Day, February 10th 2009.

The Principles are meant as a guidance to SNS providers when they seek to minimize potential harm to children and young people (Safer social networking principles for the EU 2009). According to the creators, they recommend a wide range of good practice approaches, while allowing for the diversity and judgment of the social networks themselves in terms of relevance and implementation. Referring back to the Millwood-Hargrave diagram that was introduced in chapter 2.2, the best classification of the principles would thus be as an industry code. Within the context of the Principles, "Social Networking Services" are defined as services that combine the following features:

- A platform that promotes online social interaction between two or more persons for the purposes of friendship, meeting other persons, or information exchange;
- Functionality that lets users create personal profile pages that contain information of their own choosing, such as the name or nickname of the user, photographs placed on the personal page by the user, other personal information about the user, and links to other personal pages on the service of friends or associates of the user that may be accessed by other users or visitors to the service;
- Mechanisms to communicate with other users, such as a message board, electronic mail, or instant messenger; and
- Tools that allow users to search for other users according to the profile information they choose to make available to other users (Safer social networking principles for the EU 2009).

The European Commission has, as part of its extensive encouragement and support of the self-regulatory initiative of the SNS providers committed to monitoring the implementation of the Principles within one year of the signature of the agreement. This report was present in 2010 at the "Safer Social Networking Day" (Staksrud and Lobe 2010, 10).

⁷ See annex 1 for an overview of the supporters and contributors to the principles, and annex 2 for some milestones in the creation of the principles.

4.3 Methodology: cost-benefit analysis

“To reach a public goal, society chooses between coordination through the market or through political decision making, where the institution with the lowest transaction costs is preferred. It is not enough to just show that either the market or political decision making is inefficient. The crucial question is which one of both alternatives is the least inefficient.”
(Bovenberg, van Dalen and Teulings 2003, 20-21)

Judging the efficiency of a policy or a policy-tool is not an easy task as input and output are often hard to measure. This applies particularly to this case-study. On the input-side, it is very hard to estimate the amount of resources (time, money, etc.) that various stakeholders devoted to creating the principles. On the output side, it is nearly impossible to measure the extent to which the principles have contributed to the goal of ‘a safer online environment for children’. Maybe because of those potential problems, there has not been a whole lot of research into the efficiency of self-regulatory measures (Baarsma, et al. 2004). Nonetheless I will try to execute such an efficiency analysis, building further on the small body of academic research that exists in this field.

To understand the methodology that is used for this efficiency analysis, it is important to remember that self-regulation can be framed as a normative issue of choice between public and private ordering. This assumes that the ability of consensual bargaining to achieve efficient outcomes is a function of transaction costs, thus suggesting that the normative question of when private ordering should prevail should be determined by an analysis of how those costs impact on any given situation (Ogus 1999, 590). Self-regulation may, therefore, be an appropriate solution when bargaining – at low cost – can occur between risk creators (the social network services) and those affected (children, represented by various organisations). For this reason an analysis of societal costs and benefits seems the best way to analyse the efficiency of the SSN principles as a policy tool. Therefore I will conduct a cost-benefit analysis (CB-analysis) that assesses all societal effects of the social networking principles.

First of all I will formulate two alternatives that I will compare within my analysis. Through the execution of a project society undergoes a different development than it would have gone through without the project. Public decision making is in fact choosing for one of those development courses: one of the project alternatives, or the zero-alternative (the ‘standard’ option). This CB-analysis will also be a comparison of two alternatives: formal legislation as the zero-alternative and self-regulation as the project alternative.

Zero alternative	Project alternative
Formal legislation	Self-regulation

When assessing the various effects of the principles, I will distinguish 3 kinds of effects (Baarsma, et al. 2004, 12-13). First of all there is a difference between direct and indirect effects. Direct effects are straight results of the project that happen within the sector. Indirect effects are results of a direct effect and take place in other parts of the market. There may also be external effects, which are effects that were not intended and that happened round the market (e.g. environmental effects).

Summarized:

Direct effects	Effects within the sector (paragraph 4.4.2)
Indirect effects	Effects in other parts of the market (other stakeholders, other sectors, etc.) (paragraph 4.4.3)
External effects	Unintended effects round the market (paragraph 4.4.4)

Apart from assessing those various kind of effects, I will also take a look at the societal costs of regulation in the various phases of the creation of rules. Therefore I will divide the process of regulation into the following three phases (Baarsma, et al. 2004):

Phase 1	The creation of the rules
Phase 2	Compliance with the rules through monitoring and enforcement
Phase 3	Adjustment of the regulations

I will include those three phases in my general cost-benefit analysis of the zero-alternative and the project alternative (paragraph 4.4.5).

Finally, I will distinguish between different groups that are affected by the various positive and negative effects. The four actors that I have identified as most relevant in this regard are the large social networking companies, the small social networking companies, the EU (as system of governance) and consumers (children, often represented by NGOs). The distinction between larger and smaller social networking companies has two reasons. First of all it were primarily the larger SNS's that participated in the drafting process. Secondly in the situation *ex ante* large companies in general had better regulation in place, whereas the smaller companies in general had not developed as much policy in this field. As we will see, those differences were important for the impact that the principles had on those two groups.

The spread of costs and benefits over those actors may be of crucial importance. It could be that the total costs from a *societal* point of few might be equal to the total benefits of the project, but that for example consumers loose (costs) while companies profit (benefits). Such differences may – apart from the net balance of costs and benefits – be of crucial importance when deciding on a project.

For this cost-benefit analysis, the advantages of self-regulation that are mentioned in Table 1 (chapter 2.3) are an important point of reference when identifying the benefit part of the analysis, while the disadvantages mentioned in that table are a point of reference for identifying the costs.

For each of the indicators, I will try to grade its effects by giving a plus (+), a minus (-) or a neutral (o) rating to one of the four stakeholder groups (large companies, small companies, the EU and consumers). Where no sound judgment can be made, the field is left empty. At this point it is important to stress the limits of this research. For a comprehensive judgement, it would have been needed to collect comprehensive data through surveys and interviews with all stakeholders. This was not possible within the scope of this research. Instead, those ratings are based on an extensive review of relevant policy documents, literature and interviews with various stakeholders.⁸ However the ratings do give a good indication of how each indicator is likely to have affected the interests of a particular group.

4.4 Efficiency analysis

4.4.1 Overview table: benefits and costs of the SSN-principles

Below I present an overview table in which the costs and benefits of the SSN-initiative are analysed. This overview is written from the perspective of self-regulation. In many cases the costs and benefits might turn around if I were to fill it in for formal legislation, however that is not necessarily the case. It is important to remember that if another project alternative would have been used (such as 'no action at all'), the outcome and ratings might have been totally different.

⁸ A list of the stakeholders that were interviewed can be found in chapter 8.

Benefits (+) and costs (-)	Large Companies	Small Companies	EU	Consumers	Total
Direct effects (4.4.2)					
More flexibility for companies	+	+			+
Better protection of children				+	+
More transparency				+	+
Sharing of expertise among stakeholders	o	+	+	+	?
Less hidden policy costs	+	+			+
Indirect effects (4.4.3)					
Many small companies did not participate		-			-
Non-participants may use the principles as well		+			+
External effects (4.4.4)					
Networking among stakeholders	+			+	+
Increased involvement of civil society				+	+
Costs of regulation (4.4.5)					
Phase 1: Creation					
Creation of the principles	-		+		?
More and better information within the sector	o	+			?
More flexibility for creating rules	+		+	+	+
Reduced burden for administrative system			+		+
Sensitive for lobbyists	o	o	-	o	?
Unique circumstances of internet-sector taken into account	+				+
Phase 2: Compliance					
Spontaneous compliance by other companies		+		+	+
Better compliance by sector			+		+
Burden for administrative system			-		-
Burden of regulation for companies	+	+			+
Phase 3: Adjustment					
Making adjustments in a self-regulatory system is easier than in a legislative framework	+		+		+
TOTAL	+	+	+	+	

4.4.2 *Direct effects*

The SSN Principles have had various direct effects (effects within the sector). First of all the principles offered the companies more flexibility compared to formal legislation. This was important for them as their business changes rapidly. As an interviewed commission official states:

“Whereas legislation is in place, in particular on data protection and privacy, and on protection of minors, self-regulation is necessary in order to deal with the most specific aspects of social networking and protection of minors. Technology changes fast and so do these services in order to keep up with more and more demanding users.”

On the other hand, an anonymous SNS representative states that:

“In general, the whole process took too much time. The commission itself did not have enough knowledge and the group of sites that participated was too large. Politics and other agenda’s also played a role, which resulted in conference calls that lasted for hours but led to nothing. All of this made the principles too extensive and too woolly.”

Though this last statement may be true, it has to be emphasized that when one compares the timeframe of this project alternative with the likely timeframe of the zero-alternative (formal legislation), the process went actually relatively fast. It can therefore be said that this first indicator was most likely beneficial for the SNS companies.

Better protection of children can also be identified as a separate direct effect. In February 2010 the Commission published the results of the first independent assessment of the implementation of the Safer Social Networking Principles by their signatories (Staksrud and Lobe 2010). The report also shows that most of the companies empower minors to deal with potential online risks and employ a safe approach to privacy by:

- Making it easy for users to block other users and remove comments from their profiles;
- Making privacy options easy to change so that users can choose whether only their friends or the entire world can see what they post online;
- Giving users control over the display of their online status (which allows other users to see whether they are online or not) (Staksrud and Lobe 2010).

There are also areas where the evaluation report notes less systematic implementation, such as making personal information invisible for strangers by default and excluding profiles of minors from search results. However the report states that “while very few sites are compliant with all or most Principles, many are partially compliant, and non-compliance is rare” (Staksrud and Lobe 2010, 16). The big question that remains however is: to what extent did those companies already comply with the principles *before* they signed the principles, and to what extent were the principles the reason that they started complying? This is a very difficult question, that has not been answered in the

evaluation study and on which the various persons that were interviewed had different opinions. Some of the stakeholders have doubts about the extent to which the Principles actually made a difference. As one anonymous representative of a social networking company states:

“the larger sites – where most of the traffic takes place – already complied with most of those rules. Maybe the small sites might have made some adjustments, but I think that in general the effect was very limited.”

In general, it seems like some measures have not been implemented in a very convincing way. Pijpers states that some principles could have been more concrete. According to him, measures such as good information for parents or a well-developed registration procedure for minors have in many cases not yet been implemented in a convincing way.

In the end, even if the statement that most larger sites already complied is correct, it seems very likely that the principles made a difference for at least some of the smaller sites. This is confirmed as well by most of the stakeholders that was interviewed. Thus it seems very likely that the Principles have – at least to some extent - resulted in a better protection of children online.

Another direct effect of the principles was the fact that it enabled stakeholders to share their expertise. The Task Force brought together 18 operators on the European market for under 18s, as well as organizations involved in child welfare and researchers. There were good possibilities to exchange views and experiences between the Commission, the companies and experts from both NGOs and the academic world. However, the biggest part of the knowledge in this field rests within the larger SNS's themselves. Therefore it was primarily the Commission and – to a lesser extent – Children charities that benefited from this sharing of expertise. Finally it is also likely that there are less hidden policy costs for the companies, as self-regulation increases the options for them to choose the most efficient solution (Baarsma, et al. 2004).

4.4.3 Indirect effects

As far as the indirect effects (effects on other parts of the market) go, an interesting development is that in some countries, the participating SNS company used the choice for participating in the Principles as an alternative for participation in a national initiative in this field. In certain cases, this choice for Europe hampered the process of reaching better national agreements, as the largest player in the country went for a solution at the European level. This negatively affected efforts by some smaller social network sites at the national level.

However positive results for non-participating companies have been emphasized as well. Some of the persons interviewed stressed that the mere existence of the principles enables non-participants (often smaller sites) to use the principles as guidelines for how to design their privacy policies.

4.4.4 External effects

As for the external effects, the principles may have offered a good opportunity for stakeholders in the world of online protection of minors to network with each other.⁹ Another external effect is that self-regulations offers better possibilities for citizens and civil society to get involved in the topic as there are more opportunities for them to influence the outcome of the policy process.

4.4.5 Costs of regulation

In the first phase, the creation of the policy, self-regulation offers many advantages when compared to formal legislation. Several industry representatives emphasized that the commission involved too many parties in the drafting of the principles. According to them, the process went wrong in the beginning, when the European Commission decided to do a review without proper consultation of the industry. The Commission made a first draft, which involved many wishes of children NGO's. As one business representative states:

“the first draft was terrible for the industry, and it was not based on reality nor on facts. The industry then took over and started drafting from scratch. Only then a realistic draft was made, which resulted in the Principles as we know them. The commission should not have given so much power to the charities, as this was supposed to be an industry initiative.”

Within this process, the industry had to invest resources (particularly time) in creating the principles. Therefore it may be stated that in the creation of the principles, the costs were probably higher for the larger SNS's as they had the in-house knowledge that was necessary to develop the principles.

The fact that it is possible to build further on the extensive knowledge that is present within the sector is an important benefit. In the fast-moving world of the internet, it is nearly impossible for the commission to have in-house expertise on all the latest developments and possibilities. This was emphasized by various social network representatives, who stated that “the Commission itself had little expertise”. In comparison with formal legislation, this possibility to fully use expertise from the sector is a clear advantage of self-regulation.

Flexibility is another advantage in the creation phase. As explained in chapter 2.3, self-regulation often is more prompt, flexible and effective than government regulation, and this creates clear advantages.¹⁰ It has also been emphasized by some that self-regulation is more sensitive for lobbying

⁹ Note that this is different than the “sharing of expertise among stakeholders”. The classification of “networking” under external effects is based on the fact that they are less intended and that it is harder to value it through a market price. Theoretically there might also be a risk for market restrictive behavior among the SNS's that participated. As Adam Smith said: “whenever multiple competitors get together in one room, the free market is at risk”. This risk is not analyzed in this study however as it does not seem very likely given the circumstances.

¹⁰ The flexibility in this creation phase is different from the flexibility mentioned in the ‘direct effects’ section (4.4.2). As a direct effect, flexibility had to do with companies being better able to ‘play ball’ in setting

(Baarsma, et al. 2004, 23). This may in certain cases lead to a sub-optimal policy outcome. The possible existence of conflicts of interest is confirmed by the Commission in its impact assessment, where it is stated that for industry players the conflicting interests in the market may endanger the progress of the process (European Commission 2008). Strong evidence for this has not been found in this study however, and therefore the sensitivity for lobbying is marked as neutral for the companies and consumers. Another reason for this is that rent-seeking effects are also possible when formal regulation takes place. Finally, an advantage in the creation phase was that creating the principles through self-regulation made it possible to create a better fit with the needs and dynamics of the sector. By solving this through an own initiative, the circumstances in which social networking sites operate were taken into account very well. Various people who were interviewed indicated that this might have been less the case if the issue would have been resolved through formal legislation.

In the second phase, compliance, spontaneous compliance by other companies is a consequence that was emphasized by most persons that were interviewed. Especially for some countries where none or only one company participated, the principles may have been useful. Pijpers confirms this:

“without the principles, parties in certain countries may just not participate in the process of creating a safer online environment. For those parties, the principles are good guidelines for what they should do in order to improve protection of youngsters.”

Furthermore, some authors state that self-regulation results in better compliance by the sector as they show more commitment (Baarsma, et al. 2004). This link seems clearly visible in this case study. The commitment of the industry was emphasized by various persons that were interviewed, including the commission official who stressed that:

“The Principles are an industry initiative and the fact that all stakeholders concerned wanted to join the process of drafting the agreement showed their support and commitment to the Principles”

Combined with the findings of the evaluation study that in general many principles have been implemented, the link between self-regulation and better compliance is assumed to be present. Based on academic research in this field (see chapter 2.3 for a further explanation) it can be expected that for self-regulation it is harder for authorities to supervise the application for the principles. Therefore the burden in that part is assumed to be higher. However for the companies themselves, the burden of regulation is lower as there are no formal requirements.

the standards. In the creation phase, the flexibility effects are primarily important as a means of reducing costs (in time, money, etc.).

In the third phase – adjustment of the regulation – the advantages of solving this issue through self-regulation seem clear. As many authors have emphasized, making adjustments in a self-regulatory system is easier than in a legislative framework.¹¹ Once again, this is an indicator where the high-paced character of the internet business (as emphasized in chapter 3.2) is a strong argument for preferring self-regulation above formal regulation.

When it comes to adjustment of the policy, the evaluation of the principles becomes important as those adjustments are usually based on an evaluation. Here it is interesting to note that several companies had complaints about the way in which the principles were evaluated. Several of them emphasize that a lack of involvement of the industry in the evaluation process caused misunderstandings and a wrong image of the extent to which the principles were implemented. This often had to do with the fact that there are significant differences between the participating social network services, and not all principles are applicable to every SNS in the same way. In the end, the problems in the evaluation phase are related to many of the issues that I also came across in the drafting phase. Due to the complexity and fast-moving character of social networks it is nearly impossible for policy-makers (and academic evaluators) to develop enough in-house knowledge on this issue. Therefore, this is another indication that industry involvement is crucial in this policy area.

4.5 Conclusion of the efficiency analysis

Looking back at the analysis, it becomes clear that when one compares the self-regulatory initiative with the option of formal legislation, self-regulation seems to have the most advantages for all actors involved. The societal benefits of self-regulation outweigh the costs by far, and for most actors a clear gain can be seen.

Though the system that is used does not leave room to for exact specifications of the amount in which the different actors benefited, it seems that the small industry, the commission and the consumers were the biggest winners. It is important here to note that in this study ‘consumers’ are defined as ‘children, represented by various NGO’s’. When one would separate ‘children’ and ‘NGO’s’, one might find that especially NGO’s have reached many of their goals. For children, the indicator ‘Better protection of children’ seems to be the single most important one, and on this indicator the positive outcome is not a very strong one (as indicated in chapter 4.4.2).

Larger companies have also won, most importantly because formal regulation would have offered less flexibility. However it is important to bear in mind that if the project alternative would have been ‘no regulation’, the disadvantages for the larger companies might have outweighed the advantages.

Finally it is important to re-emphasize the limits of this study. First of all this analysis only assesses two project alternatives: self-regulation versus formal legislation. There might be other project

¹¹ This argument was more extensively explained in chapter 2.3.

alternatives that are have. Also, no weights are attributed to the various indicators, as that would have required a much more in-depth research which is not within the scope of this study. It can be imagined however that for large social networking companies, an indicator like 'flexibility' is much more important than the indicator 'networking among stakeholders'.

5. Conclusion

“Networks are only a tool, they can always be abused. Trying to control them is the equivalent of trying to monitor every single street for paedophiles , while it is much more effective to teach children that they shouldn’t go along with strange men.” – Anonymous representative of a SNS

The internet offers endless opportunities to do good and evil. Social network sites are no exception to that. As this study has shown, the protection of children on those sites is a delicate but important topic. Privacy – including the online protection of children – is a fundamental concern for service providers and is among the essential human rights affected by their operation. Taking into account the international character of the issues, it seems that all stakeholders agree that there is some value in European action in the field of protecting children online. And most stakeholders stated indeed that the principles are valuable guidelines. However it always has to be taken into account that ‘nobody wants to harm children’, and stakeholders are often very cautious for criticising regulations in this field.

There are some important limits to this study that must be taken into account in order to be able to place the conclusion into perspective. This study was conducted in a relatively short period, and though some important stakeholders were interviewed, many others were not involved. More interviews or an extensive questionnaire might have led to different insights. Another factor that has not been taken into account in this study is the geographic aspect: are there differences between the effects in various regions of the EU? Finally, issues such as accountability, effectiveness and European added value have only been slightly touched upon. Those issues would deserve a study on their own. Another project alternative – such as ‘no action at all’ – might also have given different insights.

Nonetheless this study does offer some interesting insights. It seems that – compared to formal legislation – self-regulation was the best option when looking at the benefits for society as a whole. Some won more than others: small companies, the Commission and children NGO’s seem to have had the most benefits. For large companies the gains seem not that big, as most of them already had some kind of policy in this field and they had to go through the effort of creating the principles. For children the benefits are hard to measure: for them the single most important indicator is the extent to which they were actually better protected, and no extensive research in that field has been conducted yet. However there is evidence that some smaller sites used the principles as guidelines, and the awareness of child protection issues has certainly raised among all stakeholders. So it can be assumed that children profited at least to some extent.

So then can we conclude that self-regulation is the way to go? This is not necessarily the case. Some important parts of the principles have not been implemented sufficiently yet. Though the industry has shown commitment with regard to the principles, it is not sure that they will choose for protection of children in areas where it might affect their profit. In the end therefore, it is not about a choice between self-regulation or formal legislation, but it is about creating an optimal mix of the two. Legislation and self-regulation do not exclude one another. Instead, it is likely that the best results may be achieved by some form of co-regulation, where all stakeholders jointly create standards, which are then turned into formal legislation. In this way, the advantages that self-regulation has in the standard-setting phase are combined with the (assumed) higher effectiveness of formal legislation. Furthermore, self-regulation may fill gaps that are left after formal legislation, and vice versa. If turning the full principles into formal legislation is not an option, it might be possible to choose a set of minimum standards and formalize those.

Whatever option is chosen though, it seems that due to the unique character of the internet industry, a high level of involvement of the industry is an essential ingredient for success. Self-regulation and other industry-initiatives have naturally developed as the way for dealing with issues of internet governance. Internet companies are currently meeting and cooperating voluntarily, and it seems that due to jurisdiction issues, it will not be easy to push for a co-regulatory direction. Unless websites are actively blocked by Member States – which is not likely in western democracies – formal regulation seems nearly impossible on the short term. This leads me to the conclusion that for the policy goal of promoting a safer environment for children online, self-regulation seems to be more efficient than formal regulation. As the opening quote by Commissioner Reding already stated: trying to regulate the internet would be a foolish idea.

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7. List of persons interviewed

The following persons were interviewed for this research:

- Alina Radu, Safer internet unit, DG Information Society & Media, European Commission
- Luc Delany, European Policy Associate, Google
- Remco Pijpers, Director at “Mijn Kind Online” and Youth and Social Media expert
- 2 anonymous representatives of Social Networking Companies
- An anonymous representative of an NGO

Annex A. List of supporters and contributors to the Principles

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Annex B. Important milestones in the realization of the principles

