

Meta | EU YOUTH PRIVACY FORUM

TRANSPARENCY AS A CORNERSTONE FOR AGE-APPROPRIATE DIGITAL SERVICES AND YOUTH EMPOWERMENT

28 APRIL 2023 | BRUSSELS

The Forum was conducted under Chatham House Rule and names have not been attributed to individual comments, except where individuals have given their permission.

01

BACKGROUND

Recapping previous Forum events, and sharing the underlying objective of bringing together diverse stakeholders, Meta highlighted the benefits of having such a diverse group of stakeholders together in one room, with dedicated time to focus on topics such as this. At previous events, Meta has seen privacy and safety voices join subject matter experts to nuance debates on key youth matters such as CSA, age verification and digital identity, and consider the different building blocks that, together, can support age-appropriate digital experiences. This integrated and holistic approach to safety and privacy is key to ensuring that the rights of the child are upheld.

Welcoming attendees, Meta introduced the Forum topic by providing a high level overview of the regulatory landscape as it relates to transparency and youth focused provisions. Starting with data protection, Meta summarised the transparency obligations included within the General Data Protection Regulation (GDPR), referencing the specific protection afforded to children including reference to communication being provided in clear and plain language so that the child can easily understand any information addressed to them. In addition, and limited to data protection aspects, we find references to how data protection regulators assess transparency in general in the European Data Protection Board's Transparency Guidelines, but also in youth specific guidance published by the Irish DPC, the ICO, and the CNIL, for example.

Looking beyond data protection, transparency requirements as they relate to digital services are also found elsewhere in the European regulatory landscape. For example, at the EU level, the Digital Services Act introduces transparency obligations for platforms around recommender systems and advertising, and making terms of service understandable to minors. Also, the European Commission's Better Internet for Kids Strategy which, specifically, references design principles that include age-appropriate, easily understandable and accessible information and supporting digital empowerment for young people.

Meta reflected that the underlying principle seen across the landscape is that, when it comes to transparency for young people, ensuring information is provided clearly and in an age-appropriate manner is key. The challenge lies in translating this into practice.

Introducing one method for better understanding what young people need, Meta touched on the EU Youth Design Jam which took place the same week as the Forum and saw 19 teens from across Europe travel to Brussels to participate in a two-day design challenge exploring age-appropriate personalisation and transparency for digital services. Introducing the Design Jam concept which was to be explored in detail in one of the later Forum sessions, Meta reflected on this consultation and research exercise, including the importance of giving young people a voice in the design and development process of digital apps. Giving the example of a conversation with one teen participant who asked about companies' environmental sustainability strategies in relation to how and where they store data, it demonstrated the thoughtful and broad reaching interest that young people have in data and personal, as well as societal, impact.

In the first session, Forum attendees split into breakout groups to consider a series of questions exploring the role of transparency in age-appropriate digital services.

Given the context that it is internationally recognised (for example, within the UN Convention on the Rights of the Child) that young people have the right to participate in the digital world, to develop skills and experiences as digital citizens and be empowered to use their voices for good, attendees were asked to consider the role that transparency plays in this, and how it fits in with youth safety, privacy and empowerment.

Reporting back to the wider group the key findings were:

- Transparency means 'no surprises'. Attendees agreed that transparency is a value and means being clear and honest. For digital services this means educating individuals about how something works, why information is needed and how it is used, for example. We can be quick to class young people as 'digital natives'. However, despite many having grown up amongst technology and digital platforms, we shouldn't assume that young people know how things work. When it comes to providing transparency information to young people in particular, it should be done proactively; they might not know that they need to know the information.
- Transparency is an empowerment tool. By providing relevant and meaningful information and supporting broader education, transparency can enable informed decision making. When it comes to transparency of data processing this can help users decide 'Do I want my data to be used in that way?', 'Am I OK with my information being shared with that person, or organisation?', 'How long will they have my information for, and why do they need it?', 'How might my actions on one online platform impact what happens on another?'. By knowing the rules of the game, young people can decide if they want to play it, having been informed about what the potential consequences might be in a way that resonates with them. Over time, effective transparency can support young people in developing their digital skills so that they may confidently navigate the benefits and challenges of the online world as they become more autonomous.
- Transparency is holistic by nature. Transparency and education are useful tools for balancing the different rights of a child. For example, effective transparency and education can help to protect young people's privacy by being clear about what data is being processed and for what purpose, in turn helping them to understand and recognise the value of their personal information, it can help protect young people from harm by educating them about risks, provide information about certain safety settings/tools and why they are in place, and can help support parents and guardians in conversations with their teens about their online experiences building trust. Supporting digital literacy, learning through trial and error and age-appropriate exposure, can help young people to understand why their experience is tailored for their age but also prepare them for life online where the protections for minors fall away or become optional as they become adults, striking a balance between protecting young people and facilitating their connection and development in the digital environment.
- Transparency needs are not linear. Users' needs, level of literacy and awareness of risks and harms are varied and this is particularly the case when looking at minors as a user group - it is challenging even to group teens (13-17) as a collective. When we think about age-appropriate transparency, we need to not over-index on chronological age. Transparency plays an ongoing role and should be flexible to accommodate diverse and changing needs.
- There is a lot of information to communicate. Legislation requires platforms to proactively provide certain transparency information to users, for example about certain processing activity as set out within the GDPR. In addition, information needs to be communicated to users in order to support their safe, private and healthy experience online and develop their understanding of how a platform works, for example, onboarding information for a new user following registration, or for existing users following the release of new tools/settings. This can be overwhelming if provided in one go, and can lead to users skipping over important information. As a result, platforms have to consider what they are legally required to communicate, what they need to communicate for the safety, privacy and wellbeing of their users, and how to deliver all of this in an effective and engaging way.

03

THE ROLE OF TRANSPARENCY IN AGE-APPROPRIATE DIGITAL SERVICES

04

CO- AND SELF-REGULATION FOR AGE-APPROPRIATE DIGITAL SERVICES

Meta's EU Youth Privacy Forum series was established in 2022, running as half day in-person events in Brussels attracting a broad group of stakeholders including academics, regulators, policymakers, industry, civil society and NGOs. The Forum creates a space for these groups to discuss youth hot topics, share insights from their respective backgrounds and sectors, identify challenges and opportunities and nuance discussions with the ultimate objective of supporting age-appropriate experiences for young people online.

Events to date have built a common understanding that there is not one 'key ingredient' for age-appropriate digital services, but instead a number of building blocks, involving different stakeholders, that together can support age-appropriate digital experiences. Examining the semantics of what age-appropriate means and the regulatory landscape, covering existing legislation, guidance, and regulation, plus initiatives on the horizon, attendees at previous Youth Forum events have considered the roles and responsibilities of different stakeholders and participated in deep-dive sessions on topics including detection and prevention of child sexual abuse (CSA), age assurance and age verification.

At the fourth event in the series, Meta welcomed a number of returning Forum attendees, in addition to new participants joining to represent their respective sectors for the first time. The event centred on the topic of transparency, the role that it plays for age-appropriate digital experiences, and how to deliver meaningful and effective transparency and education in an age-appropriate way.



Having considered the current regulatory landscape in their breakout groups, the Forum heard from two speakers about the value that alternative forms of regulation can bring for age-appropriate digital services.

Using the EU Code of conduct on age-appropriate design (EU Code) and the European Youth Online Data Protection Code of Conduct (GDPR Youth Code) as examples of such initiatives, the speakers highlighted the benefits of developing regulatory codes collaboratively. A cross-industry, multi-stakeholder approach, including seeking input from and consultation with parents, youth representatives and experts, will result in strong youth standards that protect young people's online participation and rights as digital citizens.

Looking in more detail at the EU Code, the speaker set out its background. Having been included as one of the key actions within the European Commission's Better Internet for Kids Strategy (BIK+) published last year, the EU Code will build on the Digital Services Act and will set out what is needed to ensure the safety, privacy and security of children when using digital products and services. BIK+ looks at safety, empowerment and participation under its three pillars and

importantly addresses that these should be balanced. By inviting industry, civil society, and academia to join a special group to input in the EU Code development process, it is expected that this will result in a code containing achievable, nuanced, and harmonised best practices and standards for digital platforms to become signatory to across Europe. Meta and other industry stakeholders have applied to be part of the European Commission's working group to co-draft it, and look forward to sharing experience from an industry perspective.

The GDPR Youth Code is a separate initiative to develop a code of conduct focused on specific aspects of the protection of young people's personal information online that, once finalised, will satisfy the requirements for codes of conduct under the GDPR. The speaker explained that Technology Ireland (an Association within Ibec, the Irish Business and Employers' Confederation) has been working with industry members who provide online services to a broad user group that commonly includes youth, to develop a GDPR Youth Code. The code will focus on transparency (from a data protection perspective only) and data protection rights for young people, with the aim of driving age-appropriate standards

05

TEEN RESEARCH AND CO-DESIGN: INSIGHTS AND KEY TAKEAWAYS

When it comes to young people in particular, research, consultation and co-design has played an invaluable role in developing Meta's approach and informing policy and product development. One of the main tools for collaboration with experts, teens and guardians is the Trust, Transparency and Control Labs (TTC Labs), a multi-year effort supported by Meta to co-create age-appropriate solutions in support of positive online experiences. TTC Labs has undertaken research and consultation specifically on the topic of age-appropriate transparency and education, including an EU Youth Design Jam which took place the week of the Youth Forum.

Joining the Youth Forum to share insights and key takeaways from their collaboration with young people at the EU Youth Design Jam were representatives from Meta and TTC Labs including policy and privacy product team members, alongside partners from ThinkYoung, a Brussels-based not for profit organisation which works to improve the lives of young people, and a Better Internet for Kids Youth Ambassador from Spain who had participated in the Design Jam.

Providing a brief background, TTC Labs explained that their pioneering work began in 2018 developing co-design methods with teens, guardians and experts in order to better understand people's needs around age-appropriate experiences online with regards to privacy, safety and well-being. Research to date has taken place across the world in order to understand the commonalities of youth, guardian and family experiences as well as key cross-cultural considerations as part of a cross-industry effort to help build more inclusive and positive digital experiences. TTC Labs stressed that it is important to [develop research and consultation methods](#) to:

- Ensure meaningful participation of the people that use digital apps in youth / family settings
- Triangulate perspectives between young people, guardians, experts and digital app designers
- Share learnings so that others operating in the ecosystem can build frameworks for developing products and encouraging responsible innovation.

Forum attendees heard insights from Meta and TTC Labs' research on transparency and education to date, including:

- Research with adults shows that transparency should be in service of a few core user needs. These include:
 - Reassurance - intercepting and addressing users' concerns
 - Agency - equipping users with control over their data
 - Relevance - helping users perceive the benefits that the use of their data affords
 - Understanding - providing meaningful understanding of data practices.
- Digital education is more than just acquiring the technical fluency needed to know what a product is for, how to use it, and be aware of its features. It's also about building skills and dispositions so that young people can navigate the online world safely and healthily, in ways that support their mindful reflection and responsible decision-making.
- [Teens learn about online privacy](#) through a combination of different mechanisms:
 - Instruction - direct instruction received through conversations with parents, siblings, friends and others
 - Direct experiences - learning through their own experiences of using apps (e.g. exploration, trial and error)
 - Repetition - repeated exposure to privacy content over time to build mindful reflection
 - Reflection - mindful reflection either alone or in discussion with trusted adults or peers.

The focus for the EU Youth Design Jam was to build on these findings and explore personalisation, privacy communications and data transparency / education with teens. Using a toolkit including hypothetical concepts and [personas](#), the EU Youth Design Jam involved inviting young people to consider different scenarios, engaging and empowering them to share and develop ideas for potential solutions collaboratively. The team shared their initial takeaways from the session, including:

- Relevancy rather than reassurance. Teens see the value in personalised digital services and they tend to engage with fewer concerns than other demographics. They're intuitively aware of how these services work and they're motivated to understand the value exchange
- Context is key. Teens aren't motivated to learn for learning's sake - they want transparency to meet them where they are and in a way that is relevant to their experience
- Desire for custom controls. Teens value more flexible controls that reflect the different ways they may use social technologies, like options to choose privacy settings from a continuum instead of a binary toggle, or nuanced audience settings
- Showing, not just telling. Teens are interested in seeing the real-world effects of the choices they make.

The detailed insights from the session will be operationalised as part of [Meta's Best Interests of the Child Framework](#) including in guidance for designers and developers, as well as to inform company decision-making.

ThinkYoung representatives provided their reflections from the event, sharing that it was excellent to see the enthusiasm and active involvement of teens in exploring some of the challenges faced by online platforms. Young people have become used to being spoken to and being passive receivers of information, but this does not reflect their right to participate in society and as digital citizens. ThinkYoung explained that events such as the Design Jam are essential to give young people a voice to share ideas, express concerns and shape their future. This event enabled teens from across the region to join together in discussions, bringing different backgrounds and experiences together and enabling them to tell platforms and policymakers directly what they need. By exploring personalisation and co-designing future-facing solutions for data transparency and education, we saw the willingness of young people to deeply engage with digital challenges through critical thinking, creativity and collaboration.

The BIK+ Youth Ambassador explained his role in the Design Jam as one of the youth mentors, having themselves been involved in youth participation through the Safer Internet Forum for almost 8 years. They described the event as an enriching experience to explore product development and privacy rights, and give a voice to young people in conversations with industry and policymakers. They stressed the importance of such events, that young people themselves should be proactively involved in helping to build better online environments and have a say in how this is achieved.

Having considered the important and holistic role that transparency plays in providing an age-appropriate experience, Forum attendees once again broke into small groups to discuss the question of what effective and meaningful transparency for young people requires.

Sharing insights into group discussions with the wider Forum, it was clear that this is a complex topic with each group identifying challenges for effective information and communication sharing, a multitude of different approaches that could be implemented, but ultimately recognition that there is no one single method that alone 'ticks the box' of effective age-appropriate transparency, especially given the diverse needs of young people.

Key takeaways from discussions included:

- Information + context + control. Promoting an understanding of how something works, and why it is happening is better than just being transparent that it is happening, and can help educate young people and support informed choices. If this can be paired with contextual controls, even better. For example, being able to learn more about why you are being shown something, understanding what information has been used to inform this and giving you the option to change it.
- Communicate using a range of methods. Young people learn in different ways, and have different appetites and resonance with the individual. All agreed that lengthy legalistic documents are not appropriate for young people, and in many cases, are not an effective communication tool for adults. When you can make something work for the young, it is likely to also work for older people (and even the oldest users), which could support broader transparency compliance. It was felt that the best approach is to provide information in different formats, and ideally a combination of:
 - non-textual information e.g. videos, pictures, symbols, graphics
 - in-context information and intuitive and findable help/education spaces
 - digestible 'chunks' of clear and simple text
 - layered information.
- Information needs to be prioritised. There is too much information for a young person to download and digest in one go and article 13 GDPR is not the right instrument. Transparency and education needs to be recognised as an ongoing process, using taxonomies of importance to prioritise information dissemination for example, considering fundamental rights and risks.
- Ask teens (and others) what they need. Teens can speak to their own experiences online and provide feedback on what can be done better. Seek guidance from and collaborate with experts, involve young people in curating the design of information directed at them, engage with parents and guardians to understand their perspectives and the support they need. Test resources with different groups, measure their impact, and iterate.
- Consider your 'secondary audience'. Young people are often supported by parents, siblings or their teachers and many will learn about responsible behaviour both on and offline through these relationships. It is therefore important to build transparency and education tailored for these groups, to build their digital literacy and understanding of how data is used, how products and platforms work, the risks and benefits, and importantly, support them in having meaningful conversations about being safe online.
- Don't shy away from explaining complex processes. Considering the example of the growing use and evolution of algorithms, transparency on such technology is important for young people to better understand how their apps work. Transparency on what content gets boosted and upranked in

06

ACHIEVING MEANINGFUL AND EFFECTIVE TRANSPARENCY FOR YOUNG PEOPLE

for youth personal data in online environments. The aim is to produce a code that organisations of different sizes can achieve and create a level playing field within sectors by contributing to age-appropriate digital services at an EU level.

The speaker identified that the GDPR enables industry to create their own code (self-regulatory) but that the aim is to seek approval from the European Data Protection Board and the Commission to have the code achieved by GDPR code status, with signatories to be monitored by an appropriate monitoring body. Signing up to such a code can serve as evidence of compliance with the provisions under the GDPR and so is a valuable tool both for industry and for regulators.

Asked about whether the GDPR Youth Code would also include a certification scheme, the speaker explained that the first priority of the working group was to develop the text of the code and engage and consult with relevant stakeholders. Certification had not yet been explored but could be something to be considered once the GDPR Youth Code had been further developed.

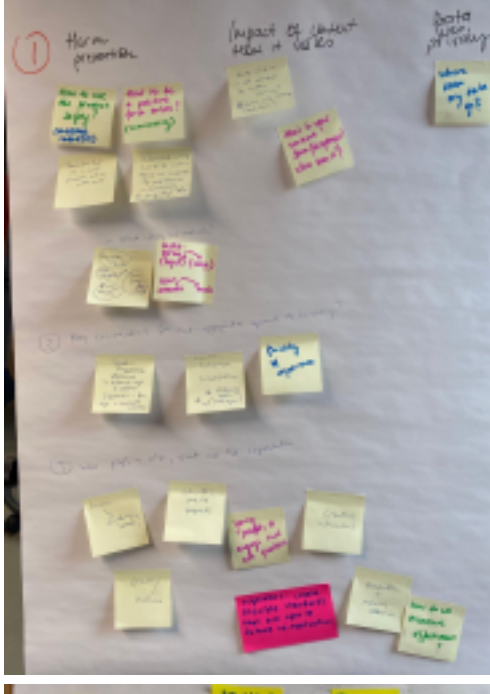
The speakers acknowledged that the two codes will both focus on protecting and empowering young people and could co-exist. This is because their purpose and scope are each distinct. Parties involved in both codes should be aware of the existence of the other (and there are benefits to parties being involved in the development of both), and work will need to be done to ensure that having two youth focused European codes does not create complexities or overlap for signatories to them. Another speaker spoke of the lessons that could be learned from strengthened initiatives, such as the approach taken with the Strengthened EU Disinformation Code where there was pressure to include commitments to provide tools to share data with researchers in a privacy-preserving manner. To address this pressure, the EU Disinformation Code includes a commitment to work together with other signatories to set up an independent authority able to vet researchers and a privacy preserving data-sharing safeguards and process, giving the example of a separate working group. A similar approach could be taken for these new youth focused codes.

their feed is needed, especially since digital app recommendation systems are likely to continue to be complex. Digital app designers and developers need to make these experiences engaging and involve young people in the process of learning.

In addition, Forum attendees considered the roles and responsibilities of different stakeholders. Parents, industry and policymakers were all viewed as playing an important role in supporting and shaping teens' online experiences, together with the involvement and participation of teens themselves.

A recurring point was that we need to be better at providing digital education and include it as part of the standard curriculum. Educators are the experts at teaching young people and

by the UK's Channel 4 Television Corporation.



In the days prior to the Youth Forum, Meta joined the first meeting of a High Level Working Group on Privacy and Safety (HLWG), convened by Professor Andy Phippen. Given the synergies between Meta's Youth Forum concept and aims of the HLWG, Meta invited Professor Phippen to share his insights into a holistic, person-centred approach to online safeguarding which he provided in a brief video recording for attendees of the Youth Forum. Professor Andy Phippen is a digital rights and safety researcher with twenty years experience in the field. He has carried out a large amount of grass roots research on issues such as attitudes toward privacy and data protection, internet safety and contemporary issues such as sexting, peer abuse and the impact of digital technology on wellbeing.

In his recorded intervention, Professor Phippen shared how the HLWG came about, following his numerous conversations with stakeholders about the cyclical debate on online safeguarding. He identified that there was a desire from different stakeholders to move the conversation and media stories along from 'How do we stop this?', to 'How we do online safeguarding better?', recognising that privacy and safety are fundamental rights and that one does not trump the other.

Attended by 22 people from across academia, civil society and industry, the HLWG has been established to explore this concept in more detail and see whether there is consensus amongst the group that a shift in dialogue needs to happen, moving to a position that respects people's right to online participation and to privacy, and drive discussions where central concepts such as harm, risk, vulnerability, well-being, best interest, supervision are addressed in a nuanced and contextual manner. Professor Phippen explained that all who joined this first meeting shared the goal of wanting to make it better for young people to go online and work to mitigate risks they may face when doing so. However, achieving this in practice is complex.

Professor Phippen spoke about fundamental rights. The United Nations Convention on the Rights of the Child has been ratified and does not place one right higher than another - there is no hierarchy and as such, society (in the broadest sense) should not be trading rights off against each other; a holistic approach is what is required rather than 'this right trumps that'.

It was agreed that transparency and education is a fundamental part of online safeguarding. Education is almost entirely missing from policy spaces despite it being a key part of risk mitigation. Professor Phippen highlighted that when you talk with young people they speak of their need for support, help and ultimately, better education. Industry can support education through being transparent in areas such as their community standards and in-house processes for content moderation and takedown. There can be a misconception from young people that there is no point reporting something as nothing comes of it. Industry can help bust this myth by highlighting the tools that exist and sharing information about reporting and takedowns.

The HLWG examined the role society plays in solving this challenge. The general view is that this is not something that should be left to platforms to solve on their own and requires a multi-stakeholder effort. The role of parents was discussed and it was identified that this group can themselves be problematic. Whilst often positive, parents can challenge perspectives of other stakeholders or erode children's rights. Further, parents often don't engage with public education resources. We are now moving to a time where parents also experienced online safety education, however this education isn't, and hasn't been great. Further consideration needs to be given about how to effectively involve this stakeholder group and their role in the ecosystem.

The group touched on the efficacy of regulation and the importance of regulators taking into account broad stakeholder perspectives, not just the platform duty of care. Professor Phippen shared that regulators are an influential stakeholder, particularly in the realm of policymaking. Regulators can, and should, strongly advocate for digital literacy for example. It was also highlighted that there is potential for different regulators for different areas heading for a collision course, giving the example of where regulators sit at different ends of the spectrum for end-to-end-encryption. As such there is a need for continued dialogue between regulators themselves, to consider the other rights that exist.

Professor Phippen shared a diagram (Figure 1) with the Youth Forum that he and Emma Bond (University of Suffolk) developed demonstrating the multi-stakeholder model. The diagram maps all the stakeholders that sit around a child. Each should have the child's safety and wellbeing as their primary consideration, and if the model is to be effective, all should interact together to support this. However, currently, in practice, all focus is on industry. There was consensus from the HLWG that this model is how it should be.

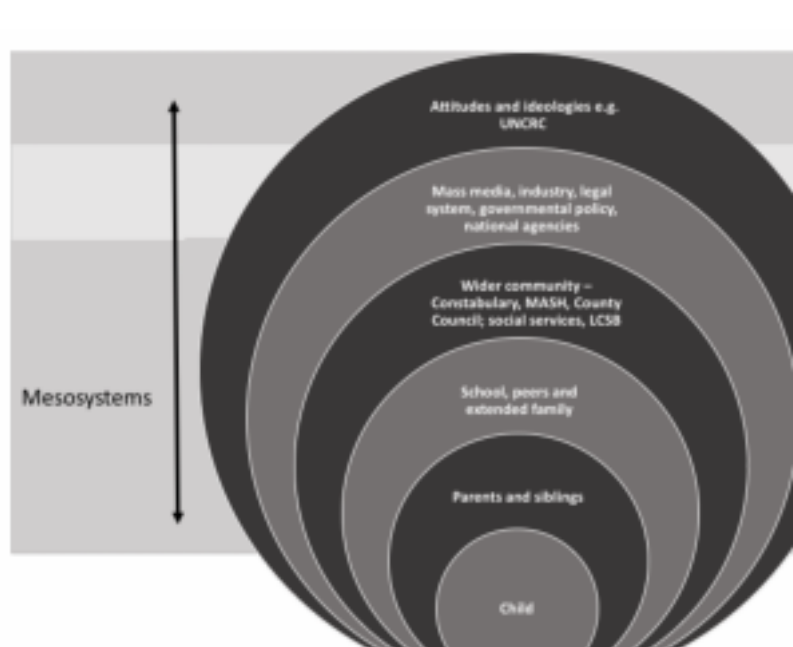


Figure 1 – A stakeholder model for child online safety (adapted from Bronfenbrenner, 1979)

In the final session, Forum participants heard from a European online safety regulator who reflected on their key takeaways from the day. In their role, both as a regulator and also as a parent of two children, they agreed with the multi-stakeholder model shared in Professor Phippen's presentation, expressing that we can all do better and must work together as part of the ecosystem to keep young people safe online.

The regulator shared an insight into the year ahead for them in their role as an online safety regulator which included working very closely with other digital regulators nationally, in Europe and across the world. The development of Online Safety Codes formed part of their work plan and they acknowledged the challenges of developing Codes where digital platforms operate globally and the need to avoid such organisations having to tweak country by country for slight nuances in national requirements.

In addition, the regulator reflected on the importance of engaging and consulting with other stakeholders including civil society, industry, different departments and young people themselves. Using the analogy of a jigsaw puzzle, with each stakeholder holding their own piece, they reflected that it is only when we come together that we can see the bigger picture.

Mirroring some of the discussions of previous Forums, the regulator reflected on what they expected to be priority areas for regulators in the region including age verification, harmful content, platform design, non-consensual image sharing and CSA prevention.

It was widely acknowledged that there is a huge amount of work to be done in this space however no one stakeholder holds all the answers. Conversations such as this where we can broaden our understanding from different perspectives, place the rights of young people front and centre, recognise that we all operate within the same ecosystem and drive the work forward required to move the dial together.

Meta concluded the fourth event in the EU Youth Privacy Forum series by sharing thanks with all those that had attended. It was incredibly valuable to have industry, regulators, civil society, experts, academics, researchers, content designers, associations and young people all in the same space

07

INSIGHTS INTO A HOLISTIC, PERSON-CENTRED APPROACH TO ONLINE SAFEGUARDING

08

NOTES FROM AN ONLINE SAFETY REGULATOR

09

CLOSING REMARKS

including it within lessons would mean all children receive a minimum level of digital education. It was acknowledged that there are challenges with this where technology can develop so quickly, however this reiterated the point that stakeholders need to work together.

Civil society recognised that many platforms already have a wealth of educational resources available for youth. However these resources are only effective if people know about them and it was felt that more could be done to leverage and promote these tools and resources, for example, as part of public digital literacy campaigns or targeted programs run by civil society.

The role of creators and youth peers was also mentioned, reflecting that young people listen to one another and know how best to communicate in a way that resonates well. Involving young people in campaigns or working with creators to promote awareness has been seen to be effective and have wide reach, through the My Kind of Be campaign run by Meta in 2022 in collaboration with a young designer to showcase the different safety and wellbeing tools available on Facebook and Instagram, and a similar influencer campaign run

actively contributing to conversations on this topic.

It was agreed by all that transparency plays an important role in supporting online experiences for young people and supporting their rights to participation and protection from harm. On the face of it, transparency can seem straightforward however, as demonstrated in the event's broad ranging discussions, and as seen from insights from co-design with young people, in practice there are many considerations to take into account in order to provide effective transparency and education that is also age-appropriate. Key takeaways from the day will be used by Meta to support conversations on the topic of transparency both internally but also in engagement on initiatives such as the two youth codes discussed at the event. It was hoped that these insights will also be of value to others in attendance.

