Comparing Censorship Regulations of Sina Weibo and Facebook

Not quite as different?

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1. Introduction

When anyone talks about the internet in China, one of the first things that comes to mind is 'censorship'. Indeed, scholars have widely researched censorship on the internet in China and demonstrated its omnipresence (see e.g. King, Pan, and Roberts 2014, 2013; Ruan et al. 2016). However, as scholar David Herold rightly points out, much of the research conducted by non-Chinese researchers almost obsessively focuses on this political dimension of the internet in China (Herold 2014, 21–22). This excessive focus on censorship in the Chinese context has even been labelled a new form of Orientalism: 'digital Orientalism' (Leibold 2011, 1036), which has resulted in researchers disregarding the potential consequences of censorship on the internet in other contexts. Indeed, relatively little research has been conducted on social media censorship in democratic countries. A couple of scholars have examined how Facebook has the *potential* of limiting freedom of speech (Jackson 2014; Park 2013), but to my knowledge, no comprehensive study on *actual* censorship practices on Facebook exists.

This gap in the literature is important to address: in recent years, Facebook (together with other social networks) has been under increasing pressure to impose censorship measures on posts relating to (amongst others) hate speech, terrorist groups, and fake news. Thus, to shed light on these censorship practices, this paper will draw a comparison between Facebook and the Chinese microblogging platform Sina Weibo by answering the following question: *To what extent is there a difference in the censorship guidelines of 'unwanted content' of Facebook and Sina Weibo?*

This comparison might seem far-fetched at first – the internet in China is very strongly regulated and the country ranks as 5th lowest in the World Press Freedom Index (Reporters Without Borders 2018), an indication of its stringent restrictions on freedom of speech. However, censorship management on Facebook and Sina Weibo (hereafter referred to as Weibo) actually functions similarly: the private companies are legally liable for the content they host on their websites, rather than the government directly intervening in their affairs (MacKinnon 2011, 38). Thus, the cases share important characteristics and can rightly be considered comparable (Lijphart 1971, 1975). Ultimately, the purpose of this comparison is to provoke scholars to ask comparable questions about internet in democratic states as many have already asked about the internet in China.

The remainder of this paper is structured as follows. Section two will explore the theoretical dimensions of censorship, related to the two social media platforms in particular. The third section will then briefly introduce some methodological remarks, followed by the actual comparison. The main finding of this paper is that censorship on Facebook is sometimes not at all that different from Weibo, at times even going one step further.

2. Types of Censorship on Social Media Platforms

Before comparing censorship regulations on Weibo and Facebook, it is first necessary to have a discussion on the exact definition of censorship: the way one defines censorship will inevitably

influence the outcomes of any censorship-related research. Interestingly, very few scholars discussing censorship give a precise definition of the term. Instead, many only focus on how censorship has been implemented in practice (e.g. Knockel, Crete-Nishihata, and Ruan 2018), or use different terms such as 'filtering' (Deibert 2008; Deibert and Rohozinski 2010) or 'blocking' (Crete-Nishihata et al. 2017). In general, however, many of these terms are used without clear differentiation. In the end, one thing that all approaches to censorship have in common is that a (in this case: an online) medium or outside party is manipulating the flow of information from a sender to one or more receivers for political reasons.

Manuel Castells has conceptualised these forms of manipulations in his study on power in the network society. Here, he defines four different ways power can be utilised to shape information in the network society: *networking power*, i.e. the power to include or exclude users from the network; *network power*, or the power to impose rules to be accepted in the network; *networked power*, defined as 'the relational capacity to impose an actor's will over another actor's will', for instance through the setting of rules within the network; and finally *network-making power*, or the power to create new networks and connect them to others (Castells 2009, 42–46). Ultimately, the entity wielding these forms of power has the potential to impose censorship, as also the case for social media networks. For instance, Facebook has networking power through the ability to ban users from using its network, it has network power as it can set the rules for users ('nodes') to access its network, and it has certain capacity to force users to abide by its regulations (networked power) or otherwise force them to leave the network by banning them. At the same time, Facebook itself is also subject to power in its own network: the government can impose rules before allowing Facebook to operate within its borders. Correspondingly, private companies, too, impose their demands on Facebook based on their own commercial interests – as this paper will elaborate upon later. Even users themselves can influence Facebook, as Facebook relies on them making use of their services for its own revenues. Be that as it may, the latter two forms of power are more indirect, as neither party has any direct control over Facebook. The model in figure 1 displays this interaction.
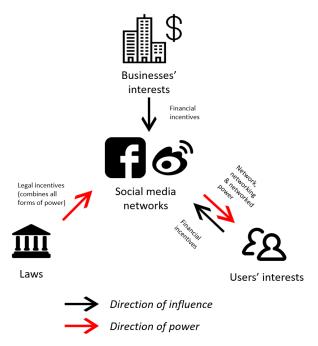
Figure 1: influence and power on social media networks, based on Castells (2009)

How does this control work in practice? In their seminal work *Access Controlled*, censorship researchers Deibert and Rohozinki identified three generations of control of cyberspace. In the first generation, blacklisted internet protocol (IP) addresses and keywords are programmed into routers and software packages, so that any request to access a blocked website is denied. In this generation, the states that deny access to online information mostly consist of authoritarian states (Deibert and Rohozinski 2010, 4). In the second generation, even the more democratic states have realised that they need to regulate cyberspace. According to Deibert and Rohozinski, second-generation internet controls go beyond merely 'denying' access by also outsourcing the control to third parties through regulations and restrictions on what can be posted (2010, 5–6). Finally, in the third generation, states have expanded their control over cyberspace through mass surveillance, which is not relevant for the purpose of this paper (Deibert and Rohozinski 2010, 23).

The second-generation outsourcing can clearly be observed in both of the cases studied here. As already briefly touched upon in the introduction, all service providers in China themselves are legally liable for the content hosted on their websites, ranging from the search results in their search engines to everything users discuss through chat messages. To prevent receiving penalties for hosting any form of illegal content, companies create special departments with employees 'whose sole job is to police users and censor content' (MacKinnon 2011, 38). In the cases of the European Union and the United States too, private companies are liable for the content hosted on their platforms. For instance, since the beginning of 2018, Germany has instituted a law that legally mandates Facebook to censor unwanted content (Bennhold 2018; Busvine and Powell 2018). Like internet companies in China, Facebook has thus also had to create its own offices and hire its own specialised staff to deal with content: its centre in Berlin alone hosts more than 1200 moderators that 'clean up' illegal content (Bennhold 2018).

Nevertheless, this approach does not yet cover everything that can be considered censorship. As highlighted in this overview, most scholars discuss censorship as political in nature. Yet in practice, it does not need to be political. Take online video platform YouTube as an example. In 2016, YouTube announced new guidelines for content creators, which were supposed to be more 'advertiser friendly' (Mulkerin 2016). In short, these guidelines meant that YouTube would demonetise videos that featured violent/sexual content or those that discussed 'controversial' topics, i.e. not allowing advertisements to be displayed on the video, meaning that creators would not be able to earn money from their videos ('Lesson: Making Advertiser-Friendly Content' 2018). Normally, users and content creators could just switch to another platform, yet YouTube's immense power as a platform means content creators are bound to the platform for their own revenues, essentially forcing them to 'censor' their content. YouTube here is different from Facebook and Weibo because it *pays* content creators for the content they host on the platform. This means that while YouTube possesses what I would refer to as 'soft' tools to enforce censorship (i.e. the demonetisation), Facebook and Weibo can only resort to 'hard' measures, such as the outright removal of posts.

One might argue here that if content is sanitised due to commercial reasons, it is simply the consequence of the free market and that people will therefore find it more acceptable than political censorship. Yet, this is by no means necessarily the case. The YouTube guidelines change in 2017 sparked a monumental amount of criticism from content creators and users, who stated that the regulation is 'a nightmare' and that they 'can't trust YouTube any more' (Solon 2017). Thus, this should rightly be considered a form of censorship, yet distinct from the purely political approach. Instead, it is censorship imposed for commercial reasons. As I will demonstrate later in this paper, some of Facebook's own community guidelines are indeed set up not only to conform to government-mandated rules but also to create a more advertiser-friendly environment. Thus, in this paper, I will define censorship as the exercise of power in a network by the medium to manipulate the otherwise free flow of information from a sender to receiver. This definition is as broad as possible, which allows shedding light on practices of censorship often left undiscussed. In particular, the outsourcing of censorship to private entities has made it potentially problematic to focus on political reasons only, as it has become more troublesome to differentiate between political and non-political rationales.

3. Censorship on Facebook and Sina Weibo

Having analysed the several types of censorship on contemporary social media platforms and their structure, I will now briefly discuss some methodological concerns before turning to analyse and compare the regulations on Facebook and Weibo.

3.1. Methodology

In order to compare Facebook and Weibo, I will narrow my focus down to two separate elements. First, what forms of expression online do the guidelines prohibit and can result in the platform censoring users? Second, how does the specific language used in the guidelines potentially affect the way the platforms administer the rules? For the first point, I am mainly concerned with the more factual and descriptive nature of the texts. For the second, I will perform a discourse analysis of both censorship guidelines. I am here particularly concerned how the form of the text used in the drafting of the regulations affects their function, i.e. their actual real-life implementation (see Wodak 2008).

To my knowledge, Weibo does not have a single, easily-accessible page with all the censorship guidelines like the one Facebook has.[1] The most recent document that clearly outlines the regulations dates back to 2012 and is called 'Sina Weibo Community Management Regulations' (新浪微博社区管理规定), but this is only a trial. As the document is no longer available on the official website, it appears to be no longer in use. In order to overcome this issue, I have instead used a number of online documents that outline more general regulations that apply to all microblogging platforms. In addition, I will analyse the more general Weibo 'terms of service' (使用协议)[2], which also includes some basic information on the censorship guidelines. Finally, Weibo occasionally publishes new regulations on their Weibo Administrator (@微博管理员)[3] microblog. All of the translations of Chinese sources provided are my own unless otherwise noted. Whenever necessary, I have used a clean research browser that reset all my browsing history, cookies, logins, and other personalisation data every session to make sure no information was 'personalised'.

3.2. Comparing censorship guidelines

Given the vastly different state of free speech and human rights in China and 'The West'[4], it may come as a surprise that many sections of the regulations display more similarities than differences. In fact, sometimes Facebook goes one step further.

This is most striking when analysing the real name requirements on both Weibo and Facebook. In 2017, China implemented a new set of laws that mandated users to register with their real name before permitting them to access online platforms. On Weibo, this is implemented by requiring users to sign up using their mobile phone number, which is directly tied to a user's ID card number (身份证号).

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[1] See ('Facebook Community Standards' 2019) for its 'community guidelines'
[2] See ('Weibo Terms of Service' 2018) for Sina Weibo's official terms of service
[3] See (Weibo Administrator 2018) for the platform's official Weibo account and relevant announcements
[4] I recognise that 'The West' is a potentially problematic term, as there are great differences between countries commonly considered as 'Western'. I use it here as a shorthand for the states in the geographical regions spanning Northern America (i.e. the United States and Canada), Europe (primarily long-standing members of the European Union) and Oceania (Australia, New Zealand). When discussing 'Western' media, I refer to English-language media from these regions.

Western media has portrayed this as another example of China's far-stretching censorship, with statements such as 'China's crackdown on Internet freedom is getting even more intense' (Shu 2017) and 'China is further tightening control of the internet' (Lee 2017). Yet, real-name policies on Facebook are much tighter.

First of all, Facebook maintains similarly stringent real-name registration regulations. In article 18 of its community guidelines, it states that users are required to use their real name on Facebook and that it does not allow users to use fake names or create inauthentic profiles. It goes even further than Weibo in the sense that it not only requires users to sign up using their real name but also requires them to display their real name publicly at all times: one's displayed name cannot include – amongst others – any 'symbols, numbers, unusual capitalisation, titles, and words or phrases in place of a name'. Contrarily, a brief analysis of the Weibo homepage highlights that the platform allows users to use aliases (see appendix 1a for an example).When it comes to the exact enforcement of these regulations, Weibo's enforcement is more water-tight: it enforces its policy through mobile-phone verification, whereas Facebook does not require users to sign up with anything that can be directly traced back to their real identity. Only when a user is reported or detected for violating these rules, can Facebook block users and require them to submit a photocopy of their identity card or passport for verification.

Second, while on Weibo it is still possible to browse and read articles without an account,[5] Facebook does not have this option. When browsing to the Facebook homepage without logging in, the only thing that appears is the registration form and any of the hyperlinks on the homepage also directly lead back to the registration form. Even going to the direct URL address of a page will trigger a pop-up requiring sign-in (see Appendix 1b).

There is a further similarity in the definitions of forbidden content themselves too: both platforms forbid a wide range of content deemed explicit or obscene, including sexual material, violence, and gore. In article 4.10.4 of Weibo's terms of service, it is stated that:

> Do not upload, display or transmit any information that is false, falsely pretending, harassing, offensive, abusive, intimidating, racially discriminatory, defamatory, divulging someone's privacy, pornographic, obscene, maliciously plagiarised, violent, bloody, related to suicide, self-harm or any other illegal information ('Weibo Terms of Service' 2018).

> 不得上传、展示或传播任何不实虚假、冒充性的、骚扰性的、中伤性的、攻击性的、辱骂性的、恐吓性的、种族歧视性的、诽谤诋毁、泄露隐私、色情淫秽、恶意抄袭、暴力、血腥、自杀、自残的或其他任何非法的信息资料。

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[5] This can be verified by opening any random Weibo page by going to the Chinese version: https://www.weibo.com/login.php. There are limits: you are required to sign up if you want to read longer posts, see e.g. https://www.weibo.com/u/2143324323

Correspondingly, Facebook also maintains an extensive list of illegal content, including criminal activities, hate speech, violence, and graphic content, adult nudity and sexual activity, sexual solicitation, and cruel and insensitive information. This is in itself not surprising: in order to cater to a wide audience, these platforms have to ensure that their platform is sanitised of information that might shock users. This already forms a powerful commercial incentive to censor certain forms of content. In addition, section two already teased another crucial factor for the removal of such content: advertisers' interests. When the platform displays advertisements on a highly controversial issue, this can harm the image of the advertiser. Therefore, it is in the interest of an advertiser to ensure that the content on social media platforms remains as 'sanitised' as possible.

However, controversial material extends beyond merely explicit or obscene content. Weibo has a rather clear stance when it comes to controversial topics: it mirrors (or rather: is forced to mirror) the stance of the government. This means that 'politically sensitive issues should not be mentioned' (政治敏感话题不发), information concerning Taiwan, Macao, and Hong Kong should only be publicised after it has been made official by the government and military material should not be disclosed (*Zhongguo Jingji Wang* 2017). Moreover, albeit the regulations themselves do not explicitly discuss this, a number of reports and leaks have highlighted how the government orders social media platforms to block new topics and keywords on a regular basis (MacKinnon 2011, 38). This falls under the items 4.10.1 and 4.10.2 of the Weibo terms of service, which stipulate that users shall not violate laws and network protocols or regulations. In the end, the most significant point of divergence lies exactly in the existence of such keyword lists: Facebook also has to follow local regulations, but does not maintain a constantly-updating list of 'sensitive issues'.

Finally, I should point out a remarkable *feature* of Facebook's censorship: in section 19 on 'false news', Facebook states that it does not remove false news, but that it reduces its distribution by displaying it lower in the news feed. In other words, it uses algorithms to effectively censor what it considers false news. To continue Ronald Deibert's typology of different generations of censorship, this might be characterised as the fourth generation of more subtle forms of censorship. For now, Facebook states that it only applies this measure to false news, but considering the pervasiveness of algorithms in determining users' news feeds, it is possible that this will expand in the future. Meanwhile, Weibo does not discuss this form of censorship anywhere at all – although this does not rule out the existence of such censorship.

3.3. Language use in the guidelines

The discussion above on false news brings me to the second section of this comparison: the language used in each of the guidelines. One item apparent in both guidelines is that the language is often rather vague, which becomes particularly clear when analysing 'false news' (虚假信息) or 'rumours' (谣言). The issue on both Weibo and Facebook is that neither platform clearly defines what is understood with

these terms. Facebook states in section 19 that 'we want to help people stay informed without stifling productive public discourse. There is also a fine line between false news and satire or opinion'. Likewise, the official regulations by the Chinese government bluntly state 'do not believe rumours, do not spread rumours' (*Zhongguo Jingji Wang* 2017). However, neither statement makes clear what is understood with by this, nor do they give any examples.

The consequence of this kind of phrasing is that it is left unclear where this 'fine line' lies or when certain subject matter should be censored, which results in over-censorship: companies want to avoid receiving sizeable fines from the government for not properly managing the content on their platforms. In the case of Facebook, this fine can be as high as €50m (Bennhold 2018). Similarly, employees at the company in question want to avoid penalties for not removing the 'correct' content. Thus, both the corporation and its employees will generally censor more than strictly necessary, despite Facebook stating that '[w]e [Facebook] err on the side of allowing content'.

In some cases, Facebook appears to have realised the danger of ambiguous guidelines and has gone through significant efforts to clarify their regulations. Section 12 of the guidelines on hate speech provides a definition ('a direct attack on people based on what we call protected characteristics – race, ethnicity, national origin, religious affiliation, sexual orientation, caste, sex, gender, gender identity, and serious disease or disability'), provides a sizeable number of examples, and categorises hate speech into different 'tiers'. Nevertheless, even Facebook does not manage to avoid all ambiguity: it states that attacks against people are considered hate speech, defined as 'expressions of contempt' and including statements such as 'I don't like'. Does that mean one would not be allowed to say, 'I don't like person X?' That seems a very far-reaching regulation.

Nonetheless, Facebook's overall clarity stands in stark contrast to the regulations on Weibo. This stems partly from the lack of a single public document that outlines all the regulations like on Facebook, but also from the actual announcements from the official Weibo Administrator account. In early 2018, Weibo announced that it would remove gay content from the platform[6] by stating that it would undertake action against 'manga and short videos with content that involves pornography, propagates blood or violence, or with gay subject matter' (涉黄的、宣扬血腥暴力、同性恋题材的漫画及短视频内容) (Weibo Administrator 2018). Gay subject matter here is barely defined beyond only a couple of terms that stem from the Japanese gay scene, resulting in ambiguity for both users and censors.

A final difference lies in the rhetoric Facebook and Weibo use to explain the rationale behind their guidelines. In the aforementioned ban on gay content, Weibo states the ban is imposed to create a 'harmonious community environment' (和谐的社区环境) and that it has to follow the Chinese Cyber Security Law. In other words, it appears to suggest that it is simply adhering to the law in removing

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[6] This would be reversed three days later after heavy criticism from users.

'illegal' (违规) content. Meanwhile, in the rather lengthy introduction to its guidelines, Facebook does not mention once the role of the state in the establishment of its regulations. Instead, it focusses on the role of the community. It uses inclusive language such as 'we' and 'our' and repeatedly brings up the importance of 'community', 'diversity' and 'public interest', for instance in '[t]he goal of our Community Standards is to encourage expression and create a safe environment. We base our policies on input from our community' and '[o]ur mission is all about embracing diverse views'. Thus, it gives the impression that the community standards – an intriguing name for such guidelines in the first place – are not built for a government, but rather to make the platform a better place for the users themselves.

4. Conclusion

For political systems so different, probably no one will claim that censorship on Facebook is as strict as on Weibo, and neither was it my purpose to suggest so. Neither was the purpose of this paper to provide a fully comprehensive overview of censorship practices on Facebook and Weibo. Due to space constraints, I have only been able to survey a relatively small section of regulations active on both platforms. Moreover, although both Weibo and Facebook are amongst the most popular social media networks in their respective regions, many other platforms exist. Considering that platforms themselves are responsible for implementing censorship regulations, it is likely that their systems also differ greatly.

In addition, by limiting myself to the official regulations of the respective companies, I have not accounted for any censorship practices that are not officially documented: just because either platform does not mention certain censorship measures, does not mean that they do not implement it in practice. In addition, this study also does not shed light on the actual *quantity* of censorship on both platforms. In consideration of the plethora of scholarship published on censorship in China, more quantitative studies should be devoted to studying the exact scope of censorship on Facebook or comparable platforms – algorithmic censorship in particular.

What the comparison of this paper has demonstrated is more fundamental: it has highlighted the importance and relevance of critically assessing censorship practices in 'The West' in a similar fashion as scholars have assessed censorship in China for years. In section three, I highlighted that some elements considered 'highly repressive' on Weibo also exist on Facebook. In fact, Facebook goes one step further in many ways, particularly in its real name registration requirements. The ways in which both Facebook and Weibo employ terms such as 'false news' also displays similarities in its vagueness.

In particular, once one opens up to the possibility that censorship is not always the outright *removal* of information by the *government* but – as discussed in section two – can include private actors and more subtle forms of information control, it becomes clear censorship on Facebook might be further reaching than commonly thought, in particular when compared to Weibo's rather 'blunt' approach. Thus, as an answer to this paper's research question, Facebook's regulations are generally less stringent

than Weibo's approach because it does not need to adhere to Chinese law, in a number of provisions it actually goes further than Weibo in its censorship.

In the end, this should raise major questions pertaining to contemporary internet censorship and cyber governance as a whole such as whether private companies should be given such power to control the internet or whether algorithmic filtering of information for censorship purposes is desirable in the first place. It should be without doubt that this is one of the most pressing issues of early 21st-century digital politics and society. Through this paper, I have given a jumpstart to this discussion and more questions will likely come up as more scholars conduct research on this subject.

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Appendix: screenshots

a. *Screenshot of a user using an alias on Weibo and showing information before log-in. The alias reads '苦咖啡', or bitter coffee*

b. *Screenshot of access being blocked and requiring sign-in. Screenshot taken 2018/12/17.*