

Implementation of the Safer Social Networking Principles for the EU: Testing of 20 Social Networks in Europe February 2010

BEBO

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Introduction

Bebo is an online community where members can find and communicate with others as well as browse and share user-generated content. Users interact with friends' profiles, send messages to other users, join groups, become fans of bands, use third party applications, and upload and share photos and videos. Users must be 13 or older to use Bebo.

Each member creates their own personal page called a profile, on which they can post their own content. Users can create profiles containing personal blogs, photos and other applications. They also allow users to embed media such as music files and video clips into their profiles and to share their original content with others by uploading it to the site. Users don't need any coding or mark-up skills to create glitzy, interactive, professional looking profiles. Users simply complete text based forms and choose skins (graphical styles) to create their profile

Once a user creates their profile, they can connect with other community members. During registration users are prompted to invite their existing contacts to join their profile. They are invited from their existing e-mail and messenger contact lists. Users can also request to connect with other community members by clicking on the 'add as friend' button on their profile. Bebo provides multiple ways for users to interact using synchronous chat, asynchronous messaging, email, blogging, discussion groups, and so on.

Each profile must include two specific modules, a comment section where other users can leave a message, and a list of the user's friends. They can select from many more modules to add. There is an large selection of "Apps" that can be easily embedded in the user's profile. Many of the modules are developed by third-party developers.

Summary findings

The self declaration provided by Bebo was in-line with the Safer Social Networking Principles. Bebo proved to be compliant with the Safer Social Networking Principles for the EU although some areas for potential improvement were identified.

Bebo provided clear safety information for children, parents and teachers. It also has developed a repository of links to well-being services for young people on its site. Bebo has a range of technical tools that empower the site's users to block unwanted contact and moderate comments they are published.

Principle 1: Raise awareness of safety education messages and acceptable use policies to users, parents, teachers and carers in a prominent, clear and age-appropriate manner

Testing found that the safety information is linked to directly from a hyperlink in the footer of the homepage. The footer containing links to Safety, Privacy and Terms of Service is available on all pages within the site. Bebo provides safety information for parents, teachers and young users. The general safety information is easy-to-find and easy-to-understand. The

same can't be said of the privacy and terms of service information that is semantically dense and riddled with legal and technical jargon.

On testing, it was discovered that the code of conduct for young users is not explicitly stated but rather contained in animated instructional pieces on the **Safety** page. There are 12 content objects that are playable through an Adobe Flash player embedded on the page. The content includes simple graphic and audio animations providing Bebo-specific advice and general internet safety awareness raising videos that have been developed by third-party online child protection initiatives. There is a considerable amount of safety information provided; it would take approximately half an hour to play all the content.

Step-by-step 'how to' instructions were found in the **Help** section of the site detailing how to configure all aspects of the Bebo site including how to configure user profile settings to facilitate a safer experience on the site. The **Help** page provides instructions on how to: delete comments, block users, report abuse, moderate comments, and cancel membership. This information is not linked to from the **Safety** page and cannot be found using the search functionality on the toolbar.

Bebo provides information and educational resources for teachers. These documents can be downloaded directly from the **Safety** page where links to third-party sources of information for teachers are also available. Similarly, relevant third-party sources of information for parents are also prominently linked to from the Safety page.

In addition to providing safety and privacy education to their users, Bebo declared that they have created a well-being centre, which allows support providers to use the Bebo platform as a means to engage with young people in need of their services. Bebo has partnerships with support organizations on issues such as depression and self-harm. The well being centre is not linked to from the **Safety** page or the footer on any of the pages within the site. Locating this area of the site proved to be difficult. This is reflected in the low level of user engagement with the profiles of the service providers. For example, the "Technology for Well-Being" group is mentioned in the self-declaration, this profile has been viewed 920 times since June 2007.

Principle 2: Work towards ensuring that services are age-appropriate for the intended audience

Bebo relies on self-declaration of age by the user in the registration process as the key mechanism for ensuring that the services they provide are age-appropriate for their audience. Bebo's self-declaration indicates that users must be 13 or older to use Bebo. It was proven that if the date of birth entered by the user during registration indicates that they are below the permitted age, they are prohibited from registering.

Bebo claim to use content moderation solutions to identify and remove any content or members that break their terms of service and acceptable use policy (TOS). According to their self-declaration, they use image filtering solutions to flag images that might be pornographic and inappropriate URLs and HTML codes are blocked from being posted on member sites. They also claim to remove the accounts of users for excessive and/or repeat offences. No pornographic content was encountered during testing.

In testing, Bebo's claim that users who declare they are younger than 13 are not permitted to join the community was validated. When trying to register as an 11-year-old permission was denied and a cookie was placed on the machine preventing re-registering as older from that machine. In the self-declaration Bebo claims it conducts textual searches to help identify users that have provided a date of birth that indicates that they are 13 or older, but who subsequently post information on their profile that indicates that they are below 13. They say that upon discovery that a user is not 13 or older, they will delete that user's account and profile.

Bebo's self declaration outlines its policy for managing access to professionally produced content to ensure that content is age-appropriate and in-line with applicable national laws and

regulations. Using the profile of a 14 year old, I was unable to get access to video content from the Skins TV series that is rated as 18+ content. No information as to why access to this content was being denied was provided.

Principle 3: Empower users through tools and technology

Bebo claims to have taken measures that can help minimise the risk of unwanted or inappropriate contact between children and young people and adults. Websites and profiles of children under the age of sixteen were not found by searching for them in Google. When registered as an under sixteen the profile was categorized as 'Private', this means only users that accepted as friends are able to access the profile or make contact. They claim it is possible for users of any age to alter their privacy settings at any time. Also, even with their profile categorized as 'Public' it is also possible for Bebo users to block other users. The declaration states that it is possible for users to configure their account to allow only 'friends' to post comments on their profile and can delete unwanted comments before they are published on their profile.

Principle 4: Provide easy-to-use mechanisms to report conduct or content that violates the Terms of Service

Bebo provides prominent mechanisms for reporting inappropriate content, contact or behaviour. These mechanisms are easily accessible to users at all times and are easy to use. However users are not given sufficient information about how their reports are being handled nor are they given any feedback on how these reports were resolved.

It was found that once logged into Bebo, the report abuse link is prominently displayed on most content modules in the site. On Bebo's Report Abuse page users are alerted to measures they can take to prevent similar abuses in the future such as blocking users and moderating comments. On the reporting form, the tester was asked to categorise the abuse type from a dropdown list, provide reasons for making the report, and provide examples of the abuse. They were also asked to agree that invalid reports would result in future reports being ignored before the report was processed. This condition could act as a deterrent to reporting. Users are not told what constitutes an invalid report.

The report abuse function was used to log the following report; "I am writing to you because someone is sending me scary messages. What should I do about this? Please help me." Text was displayed on screen indicating a report has been sent. However, no specific communications were received in response to the report indicating how it would be handled. No feedback on the outcome of the report was received. No reference number was provided that could be used to follow-up or track reports.

Principle 5: Respond to notifications of Illegal content or conduct

Bebo recognizes the importance of working with law enforcement in their declarations and outline the processes they have in place to review and remove offending content. They have arrangements to share reports of illegal content or conduct with relevant bodies. In its self-declaration, Bebo mentions its distinct route to report suspected online predator behaviour. It claims reports received through this route are dealt with as high priority and reports are disseminated to the appropriate law enforcement agency. Other mechanisms are in place to support law enforcement with investigations and prosecutions. Bebo engages with the enforcement authorities (including the UK Home Office's Single Point of Contact training program) to educate investigators about how to lawfully obtain data from Bebo.

Principle 6: Enable and encourage users to employ a safe approach to personal information and privacy

Bebo describes a range of awareness raising and technical measures they have taken to encourage users to make informed decisions about the information they post online. They also outline privacy options that are prominent in the user experience and accessible at all times. Bebo describes several technical tools for refining access to users' information. This is just as well since they ask for a considerable amount of personal information during registration including details of the user's home address, relationship status, and mobile phone number. Disclosing all this information is optional. Users are able to access and alter their privacy settings at anytime using a link in a prominent place at the top of every page or from the 'edit profile' link underneath their photograph on their profile page.

Bebo claim that details provided while registering on Bebo are not directly mapped onto the user's profile. In some cases users are given the option at registration of whether to display details or not (as in the case of their age). The Bebo self-declaration says that context specific privacy messages are provided in areas where young people make decisions about privacy. While privacy options are available during the registration process and when uploading photos; very little information about the implications of choosing the available options were found. There are safety tips close to the 'Name' and 'Age' fields in the registration process but no information is given beside all the other fields. For example, there is a field for 'Mobile Phone' in the registration process but no contextual information about where this information is published and who has access to it. No context specific privacy messages were encountered while uploading photos or tagging subjects in photos. Testing validated the claim that users need to give permission before Applications could be installed and integrated with users' profiles.

Principle 7: Assess the means for reviewing illegal or prohibited content/conduct

The SNS provider did not detail in their submissions how they assess their service to identify potential risks to children and young people in order to determine appropriate procedures for reviewing reports of images, videos and text that may contain illegal and inappropriate/unacceptable/prohibited content and/or conduct. They detail measures they take to promote compliance with the Terms of Service and Acceptable Use Policy (TOS) including a hybrid technical and human content moderation solution that identifies and removes content or members that break their TOS. According to their self-declaration, users who are found to be in breach of the Terms are either issued a conduct warning or have their accounts deleted depending on the severity of the breach.

Assessment of the Principles vs. the Self-declaration

Principle	Compliant	Partially Compliant	Not Compliant	Not Applicable	Comments/Clarification
1	X				
2	X				
3	X				
4	X				
5	X				
6	X				
7	X				

Assessment of the Self-declaration vs. the measures implemented on the SNS

Principle	Compliant	Partially Compliant	Not Compliant	Not Applicable	Comments/Clarification
1	X				
2	X				
3	X				
4		X			
5	Not Tested				
6	X				
7	Not Tested				

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