

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

## GIOVANI.IT

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### Introduction

Giovani.it (<http://www.giovani.it/>) is part of the SMG (Studenti Media Group) which provides others social networks and websites for young people: Studenti.it (where to share and access school related material), girlpower.it ('the websites for trendy, fashionable girls'). Giovani is comprised of a variety of interrelated areas and tools for communicating and networking, which are described in the menu bar at the top of the homepage:

A forum, whose threads are organized in the following categories: sex; love; literature; music; news, politics, society and religion; mobile phones; videogames; computer and the internet; sport; forum editorial staff; helpline (with forum code of conduct and abuse reporting, specific to the forum area); XXX (fetish, pornographic, and encounters offline)

- The community, that is blogs and personal profiles
- Groups, a database of the groups formed by the members (the two most populated are MSN and 'Against paedophiles')
- A gallery of pictures from blogs
- A video gallery, also from blogs

Under the menu bar, the homepage is organized in some sections showing respectively: the latest blog entries and, beside, the picture of those users who are online; underneath a photo gallery from blogs pictures; then news (mainly concerned with cinema, celebrities and sport); and again a list of forum channels; at the very bottom of the page celebrities photos and polls. The terms and conditions, privacy policy and help button are linked on the small menu bar at the very bottom of the page, and the user needs to scroll the whole page in order to find them. Once logged in, the page accessed has a menu bar on the top and on the left side (in the middle of the page just a welcome message appears). Starting from the left hand bar, there is a 'gallery' link, where you can access you friends galleries; 'blog' where you can post new entries and manage your blog layout (upload pictures and videos, choose the layout etc.) and check your friends' latest posts; 'groups' to manage your membership to groups or to see your friends' groups; 'events' where you can check your network's events (my network is by default the network of people from my city); 'I like', where you can pick your favourites from a weekly top 20 list of music, movies, and books; 'mystudy' to share and access school notes, look for mates to prepare for exams, etc.; and 'mobile' where you can match you mobile phone number with your login information so as to upload new posts and MMS by mobile.

The top page menu consists of: 'profile' where you can manage personal data, upload an avatar or picture for the profile, set the privacy settings etc.; 'friends' where you get friendship requests, or are able to invite new friends, or manage the 'enemies list' (the list of undesirable friends banned from your blog); the 'network' of the city of Milano, divided in

‘events’, ‘the wall’ (mainly requests for help with schoolwork), and members; ‘messages’ that is the inbox; and ‘online users’ where to access the list of people online.

Though not specifically mentioned under the service’s terms and conditions, access to *Giovani* is restricted to 14-15 years old (people born in 1994) or older.

*The SNS has not yet published a self-declaration of Safer Social Networking Principles, so the following report will be based only on the expert’s observations and testing.*

The test has therefore measured the compliance of the tools implemented on the SNS with the Safer Social Networking Principles. To sum up the major findings, the provider has fully adhered only to the second Principle. While providing some useful tool to ensure a safer experience for children, the SNS still shows some critical points, related to information on safer use and privacy settings.

The report of findings will be articulated according to the 7 Safer Social Networking Principles.

## Reporting on testing results

*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*

The SNS provides a ‘terms and conditions’ statement, and a privacy policy but has no explicitly stated safety policy nor safety tips customized and targeted at parents and carers. Helpful information for children regarding code of conduct, inappropriate content and safety tips is disseminated in different areas of the website, rather than being located in a single page/section.

The terms and conditions, accessible from the menu bar at the bottom of the homepage, which is common to all the *Studenti Media Group*, states the inappropriate and illegal content (see terms and conditions 1.6) and code of conduct but adopts a legal language which may result difficult for younger children. Similarly, the privacy policy page includes information on the treatment of personal data by the SNS provider, in the same legal language.

Far more helpful are other sections of the website, specifically:

The Help page, accessible from the menu bar at the bottom of the homepage, provides general information on the services provided and general tips for new users, as well as some specific safety information. Safety information include: a box on the left side of the page called ‘Report misuse and children safety’ containing a link to an online form and the address of the help desk; a link ‘Profilo, interessi e dati personali’ (Profile, personal interests and data) where children are provided information on how to manage personal information and how to set privacy settings (the default setting is a profile visible to all visitors, but you can turn it into a profile visible only to logged in users, or only to friends). There is also a link to the help channel in the forum. The Help page provides information relating also to technical problems (explaining for example to newbies how to upload blog entries and pictures; or how to join or create groups, etc.)

The help blog (<http://helpblog.giovani.it/>), accessible by a link on the help page, which provides information on how to solve problems with the blog management, including some safety information: children are told how to block undesired users and comments (the process follows two steps: add a user to the ‘enemies’ list, and a filter to restrict friendship requests and comments by age or online activity specifications. It is for example possible to block users who have more than 10 ‘enemies’).

The help channel in the forum, which addresses issues concerning the use of the forum, including the forum code of conduct and abuse reporting.

Useful information, therefore, is disseminated in a variety of places. Therefore, some of the most useful safety information requires some steps before being accessed, and this may result in difficulties for some users in accessing the information they need.

To sum up the type of information available and its location:

- Information on inappropriate or illegal content is available in terms and conditions (1.6) and help blog ([http://helpblog.giovani.it/diari/2598748/quali\\_sono\\_i\\_contenuti\\_non\\_permessi.html](http://helpblog.giovani.it/diari/2598748/quali_sono_i_contenuti_non_permessi.html))
- Information on inappropriate behaviour or misconduct is provided both in the terms and conditions and in the help blog. The terms and conditions, anyway, provide a general reference to inappropriate behaviour with no clear examples of misconduct (see 1.4): it just tells that ‘the user agrees to use the service only for legal purposes and respectful of the protection of personal data according to the law on privacy’. The help blog, instead, ([http://helpblog.giovani.it/diari/2598748/quali\\_sono\\_i\\_contenuti\\_non\\_permessi.html](http://helpblog.giovani.it/diari/2598748/quali_sono_i_contenuti_non_permessi.html)) lists inappropriate content and (implicitly) behaviour.
- Information on consequences of engagement in prohibited behaviour is clearly stated in Terms and conditions 1.6.
- Information on specific risks regarding using online services is not explicitly provided within the above mentioned documents.
- Overall, the information provided is only textual and poor of concrete examples and anecdotes, resulting somewhat impersonal (especially the terms and conditions). No references to institutions and NGOs concerned with online safety are provided.

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

Though age requirements are not explicitly stated in the terms of use and privacy policy of the website, the service is age restricted enabling registration only by children born at least in 1994 (so 14 or 15 years old is the minimum age allowed). The child is not asked to state being above a certain age by ticking a box, but she/he needs to declare being assisted by one parent in the registration process.

The registration process is successfully completed only after email verification, since login is unsuccessful and the user is not recognised unless she/he clicks through the link provided in the verification email.

Cookies prevented the tester from re-signing up as a 15 years old child: the registration form was completed and sent, but apparently it was not accepted by the service, since any verification email was received. Therefore login with the second was unsuccessful. Only after deleting cookies and completing a new registration with a third profile, the tester was able to join the community as a 15 years old girl.

Despite the need to state that parents are aware of the registration and assist their child in the process, no parental control tools are provided.

### *Principle 3: Empower users through tools and technologies*

Information on how to report abuse or bullying is not immediately available on profile settings, but accessible from the homepage in the help section. However, the user has the power to block unwanted users, turning them into ‘enemies’ and report them to the SNS provider.

As soon as logged in during the performance of the test, the tester has been contacted twice (both as a 15 years old girl and as an adult) by an online user, whose name was Andrea, who sent the following request of contact: ‘Hi I am Andrea From Milano, are you interested in offline meetings?’. Thanks to the above mentioned possibilities to block requests of contact, the tester added the user to the ‘enemies’ list and reported him to the helpdesk through the notification of misconduct form (see principle 4).

Users are provided with the possibility to specify who or which groups of users can contact them by setting filters which parameters are represented by age, and by their online activity (how much personal information do they disclose in their profile, how many blogs do they have, how many friends, how many enemies, etc.)

Information on restrictions on search options for profiles (for example if adults are not able to search for minors) is not clearly provided.

User can find clear information on how to remove postings on her/his profile but the tester was not able to find information on how to remove pictures posted by other people, or personal comments and pictures posted on other people’s profiles.

The possibility to restrict posts on a user profile only to friends is given, though the default option is that all logged in users can post comments on other people’s profiles. No default option, instead, is provided for the blog, where user needs to choose among these restriction possibilities: nobody, everybody, only friends, all users except enemies, only users can post comments on the blog.

Regarding the possibility to restrict personal information only to friends, the information is misleading at this respect: on the help blog it is stated that information is available to all users, while on the privacy settings in the profile the default options is that your blog and your profile gallery is visible only to friends.

Users are given the complete control over the display of their online status by choosing if making their status visible to all users, only to friends, or invisible.

When setting the profile and uploading personal information (tastes and interests, school, etc.) or uploading picture no safety tips or guidance is offered.

The tester was not able to find information about the notification when user is tagged into other people’s pictures.

The user has the chance to delete her/his profile, thanks to a link in the ‘options’ under the profile settings. The information on how to delete the profile is available under the FAQ lists in the help page but the information is misleading: here it says deletion is immediate, while on the profile options it says it needs 7 days to become effective. No information on how the provider uses personal information (if it is retained) after deactivating the profile is available in the help page nor in the options in the profile setting area.

*Principle 4: Provide easy-to-use mechanisms to report content or conduct that violates the terms of the service* The form to report misconduct, abuse or bullying is available on the left side of the Help page, or in a pop-up when receiving a message from another user. A link/tool where to report abuse or violation of terms visible at all times is missing from the profile page and tools, but as the link is provided when receiving messages or requests for friendship by other users, its lack is partially solved this way.

Information on how to block a user is provided once receiving a message or within the privacy options in the profile settings (under the voice 'block users'). The user has the possibility to approve or decline a contact request.

When blocking a user and reporting his/her behaviour as inappropriate or offensive, no notifications messages are sent back in the profile's inbox, nor in the mailbox of the email address provided at registration.

According to the methodology, while performing the test the tester has sent a notification through the report abuse mechanism, asking for help because someone was sending scary messages. Until now (almost one month later) the tester hasn't received any response by the helpdesk to the request for help.

Once completed the abuse form on the Help page a notification message appears at the end of the process indicating that the user has sent a notification about a violation on a certain date. However, the helpdesk where the abuse report is received and managed does not send any information on how the report will be handled nor provides any feedback to the user message explaining the abuse or violation of terms.

*Principle 5: Respond to notifications of Illegal content or conduct*

The principle has not been tested on the site.

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

Privacy settings are easily changeable and manageable from the profile setting options. Apparently there are no additional applications apart from the option to combine a mobile phone number to the profile so as to upload pictures and post via mobile (and a registration process is required), or from the newsletter which is considered an integral editorial service of the provider (therefore un-subscription is impossible unless you deactivate your account). Part of the information provided during registration (age, gender and city of residence) is visible to all users. The information provided during registration includes: age (birth date), gender, educational level and name of the school or the University attended, email address, postal code of the city of residence (but not the home address), first and last name. Apart from education and school attended, all these fields are mandatory. Of the personal information used for registration only age, gender, first name and city of residence have been automatically inserted into the profile.

When signing in the service for the first time a pop up button appears announcing that for new safety policy the provider decided to make also name and surname available on the profile, and not only nickname. But then the user is asked to choose if she/he wants her/his surname to be visible to all users or if you want to be identified only by your nickname and first name. The list of the online contacts is not age restricted, so any user can search for younger users (up to 14 years old) and the tester had no problem in searching for her 15 years old profile by inserting the nickname.

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

Since the provider has not yet published a self-declaration, assessing the means for reviewing illegal or prohibited content/conduct is not possible at this stage

## Summary of results and conclusion

Since the provider has not yet published a self-declaration, the test has only assessed the level of compliance between the Safer Social Networking Principles on the one hand and the measures implemented on the SNS to adhere to each principle. The following table provides the results of this comparison.

**Assessment of the Principles 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	<i>Not Tested</i>				
6		X			
7	<i>Not Tested</i>				

As we can see from the above table the provider is fully compliant only with the second Principle. The provider includes some useful tools (the report mechanism, the filter tool to block some contacts and the ‘enemies’ list are the most evident) to promote a safe environment for users.

Nonetheless, the testing of the SNS has pointed out some critical aspects of the service. These are articulated in two main areas: information and privacy settings.

As far as information is concerned, as we have seen, safety tips are confusing due to their fragmentation and dissemination in different areas of the website. Fragmentation and dissemination may result in misleading information, as regards for example the process of deleting and deactivating the account.

As regard privacy, the default settings (profiles are by default visible to all users and so is the online status of the user) tend to expose younger users to risky contacts or contents.

A further critical aspect concerns the report of abuse and violation mechanism: though reporting an offensive message is easy (since the possibility is provided contextually to the reception of the message), reporting inappropriate contact or conduct independently from the reception of a message might be more difficult (since the form is provided in the help page not on the profile itself). Moreover, feedback on how the report was handled by the provider was not made available to the user reporting violation.

In conclusion, the provider has only partially implemented measures to empower users and to encourage a safer approach towards the display and management of personal data online.

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