

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

## **MICROSOFT EUROPE**

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The testing of the services was performed October 31<sup>st</sup> and November 7<sup>th</sup> 2009 on the UK version of Xbox Live and Windows Live.

Xbox Live (information at [www.xbox.com/live](http://www.xbox.com/live), the service is accessible through an xbox360 gaming console) is an online gaming and entertainment service from Microsoft.

Windows Live (<http://www.windowslive.co.uk/index.aspx>) is a service integrating a wide range of tools and applications such as e-mail, photo management, sharing of files, communicating with others through instant messaging services (MSN/messenger) etc.

According to the “member qualifications” in the Codes of Conduct “the services are designed for individuals 13 years of age or older”.

It should be noted that as the self-declaration specifically mention these two services, the testing has been done with the aim to find information on the sites/service itself, or directly linked from the service rather than explore the overall company website

([www.microsoft.com](http://www.microsoft.com)), as this is perceived to be the normal form of use of the services.

As the Xbox Live service requires credit card information to allow underage users (below 18) signing up, only adult testing profiles have been used-Similarly, since the reporting mechanism would have to involve real players, stage two of the reporting (delivery and receipt) has not been tested.

### **Summary of findings:**

#### **Windows LIVE:**

- Safety information is limited for users who have not signed up
- There is a strong focus on technical parental control and surveillance on the site itself. General safety information and tips for children are found on the Microsoft general site, not on the service, and is complicated to reach from the Microsoft Live site.
- Some of the safety related links provide circular references, sending you back to the site you started from. It is difficult to find information on specific risks and other resources/organizations
- Parental tools are easy to find
- A wide range of privacy tools and settings are provided
- Report mechanisms are provided and almost always visible. The reporting form is a complicated for children and is closed in the sense that you can only send notification on pre-defined issues and concerns.

#### **Xbox LIVE:**

During the testing no information on Terms of Service were found to be available until during signup, and thereafter not within the service at all.<sup>1</sup> This applies to all information on the service; none of it is available in the service, only on external websites. It should be noted that the information in these external sites is comprehensive and available at e.g. [www.xbox.com/en-GB/playsmart](http://www.xbox.com/en-GB/playsmart) but it is, as mentioned, not accessible from the Xbox Live service. This external information is therefore not tested.

- Settings for parental control/"Family settings" are built into the console's software and easily accessible
- Available tools are easy to use and find
- The signup process requires that underage users trying to sign up with their real birth date must get help from an adult who provides credit card details for age verification
- User control over the profile's privacy settings is extensive, defaults for underage profiles are set to hide/private/friends only
- User profiles contain little to no personal information, without the user specifically putting it in
- The reporting mechanism is slightly convoluted

## Testing results:

### *Principle 1 "Raise Awareness"*

#### *In the Self-Declaration:*

Relating to both the **Windows Live** and **Xbox Live** services, the self-declaration includes information on terms of use, privacy (stating that the general company policy is accessible from every page of each major online service they operate).

The provider does include information on safety in their self-declaration, but by referring to other sites within Microsoft or cooperating partners, not specifically on the Windows or Xbox Live services themselves. Similarly, safety information is stated to be targeted towards specific user groups, but with a referral to the general company site, not the service. The information is not explicitly said to be easy to understand nor presented in a prominent way, but is said to be accessible and practical stating that it "seamlessly integrates family safety options for Windows live services", mentioning specifically to include information on links to educational material and technical controls for parents. The self-declaration does not state that specific advice is given to teachers on the SNS website, but it does list cooperating organizations that do and emphasizes the importance of safety information and education in schools.

It is stated that the safety information provides guidance regarding inappropriate content and conduct and information on the consequences of breaching the Terms of Service, but with without any reference to safety services in particular, but rather referral to the very existence of the terms of service.

#### *On the site:*

In the **Windows Live** service both the Terms of service and the Privacy Policy are very easily found on the site, as are safety tips/information for parents. The terms of service clearly listed content and conduct that were not allowed, as well as the consequences of engagement in prohibited behavior. The Terms of service also states that the services are intended for users "13 years of age or older". This is not emphasized in the self declaration report. This does not

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<sup>1</sup> After then test was conducted Microsoft informed that The Terms of Use is available at any time from the Dashboard. Users need to click the large X button on the center of the controller to open the Dashboard on the console, then choose Settings, then Account Management and then Policy Info and then the Terms of Use.

apply to **Xbox Live**, where the Terms of Service is displayed once during signup, whereupon neither the Terms of Service, nor safety tips for parents could be found on the service itself during the testing.

The **Windows Live** information provided for parents was found to be easy to access but extremely limited as it gave only a few not self-explanatory screenshots along with brief textual information referring to the need to download the tool in itself in order to receive further information

The Code of conduct could not be found at the first stage of the test at all. (However, this was discovered at a later stage of the test, when searching for “pornography” under the “live help” section.)

Any parent, teacher or potential user wanting to obtain information regarding Internet safety will not be able to access this information directly from the [www.windowlive.com](http://www.windowlive.com) site, nor through Xbox Live. A Windows Live link to “family safety” is provided on the first page of the service, but when clicking on the link you are redirected to a site where you need to sign up in order to get more safety information. When clicking the “learn more” button on “Windows Live Family Safety” <http://windowlive.com/Desktop/FamilySafety> one gets more info on how to sign up to various services (messenger) not more safety information.

Safety information directed towards children or teachers could not be found when not signed in as a user, nor links to educational material or and if the organizations active in child safety that was listed in the self-declaration report. When searching for such partners/organizations, after clicking “explore” on the site, once comes to a new site with information also listing “partners”. Clicking on this link only made the same site reload.

Information on specific risks are not found on the Windows Live website, nor in Xbox Live, with the exception that information on bullying was found after going to the Windows Live privacy policy, then clicking “safety resources” where one was re-directed to [www.microsoft.com](http://www.microsoft.com) and then from there go to resources and download a folder. When going on the Microsoft online safety site ([www.microsoft.com/protect/family](http://www.microsoft.com/protect/family)) some information regarding specific risks can be found. In an attempt to find information on specific risks, the search engine provided at the safety site were used. Searching for information on specific harms on the Safety Site using terms such as pornography or violence gave no results at all.  
*Principle 2”Ensuring Age Appropriate Services”*

#### *In the Self-Declaration:*

The self-declaration outlines how it is made clear to users when services are not appropriate for children and young people, most importantly by the existence of filtering services. The declaration states that “generally speaking, Microsoft services with social networking capabilities are general audience services and do not target particular age groups”. Hence, no specific steps to deny access to e.g. under aged users or refusal of attempts to re-register with a different age are relevant to these services. However, extensive parental tools are implemented, including limitation of inappropriate content and control over who can communicate with the child. For the gaming service Xbox Live, the declaration states that adherence to content rating systems is implemented. This is tied to the console's "Family Settings", where parents can limit access to games based on their rating(s).

#### *On the site:*

When signing up to the Windows Live site, no age verification is needed; however, the service requires you to list your year of birth (but not the date). The testing profile of 11 years was therefore successfully used for the remaining relevant parts of the test. It should be noted that this was under the recommended age for the site (above 13 years). For the Xbox Live service, although not mentioned in the self-declaration, a birth date is requested, and parents' consent, verified by entering credit card details, for users under 18. This being a requirement meant that finalizing the signup process for underage users was not done.

When signed in to Windows Live parental control tools can easily be found, give sufficient information and allows for monitoring the child's activity, provided that the parent is also a registered user. This also applies to Xbox Live, where control tools are built into the console's software. Similarly, profile settings are easily found.

*Principle 3 "Empower users through tools and technology"*

*In the Self-Declaration:* The provider does indicate in the self-declaration that on Windows Live:

- the private profiles of users registered as under the age of 18 are not searchable on the service or via search engines
- full profiles are set to 'private' by default or to the user's approved contact list for those registering under the age of 18
- users have control over who can access their full profile by, for e.g., being able to block friends or 'reject' friend requests
- users have the option to allow only direct friends to post comments and content to their profiles
- users have the option to specify who can post and view comments from other users
- it provides easy-to-use tools for users to report inappropriate contact from another user
- it provides easy-to-use tools for users to report inappropriate conduct by another user
- it educates parents about available tools, both for wider internet access and the tools, information and advice provided to parents by SNS to help them protect young people

The self-declaration does *not* indicate:

- that users have the option to delete unwanted comments of other users
- how users can delete their profiles

For Xbox Live, the declaration says:

- the default settings for profiles are 'blocked' for the under 13s, and 'friends only' for those between 13 and 18
- Users can share profile with friends only, or block all access to profile
- users can complain about other users content or behavior
- Microsoft provides awareness-raising web sites

*Not in the self-declaration:*

- information on how to delete profiles

Since there is no system provision for posting comments on other user's profiles, related issues are not reported on in the self-declaration

*On Windows Live:*

It is easy to find information on how to report abuse or bullying, how to block other users from contacting you. Information on the possibility to specify who or which groups of users that could contact you (except form already confirmed "friends) was not found. After signing up information on restrictions of search options for profiles were found easily.

When signed into the profile it was not clear how much or if at all the user's personal information was visible to all other users, nor if the online status (if one is logged on or not) could be seen by others. But one has to explicitly change settings in order to make all personal information visible to other users.

Other users, or just friends, can post comments on the profile, but this requires that the user changes the settings to allow for publication of friends (private) or all users (public). No special warnings/tips or guidance were given regarding personal information when profile picture and personal information was uploaded. However, when re-signing into the site a general message appeared on the profile encouraging the user to learn more about privacy setting, options and managing permissions.

Information on how (or if at all possible) to delete/remove pictures and postings on other peoples profile was not found. However, one can revoke a general permission for anyone to tag you in a picture uploaded by others.

When wanting to delete the profile, information was not found on the profile site, and no information was given when searching for “delete profile” under the help section. After considerable searching some information was found under the “account” section. The information provided here was clear, and stated that one could deactivate ones profile, but not delete it completely as some information would be stored. The provided did give sufficient information regarding what personal information that would be retained/collected after the profile was deleted and how this might be used.

Finally, when signing out as a child and then logging onto a adult profile, the testing profile of an 11 –year old girl automatically came up as a friend suggestion for the adult profile, without having any common friends (or friends of friends). Here also information on the child profiles location, name and interests became available.<sup>2</sup>

One was able to find profiles of other 11-year olds when using the Windows Live search engine fairly easily by searching on e.g. “born in 1998”.

*On Xbox Live:*

No information on how to report abuse or bullying could be found on the Xbox Live system. How to block others contact is easily found, as is the blocking mechanism itself.

Pictures you may have entered into your profile are easily removed.

As an above-18 user, the profile is by default accessible to all. Changing this is easy, as is the control over the profile's online status visibility. Safety tips are displayed when the profile is (attempted to be) updated.

No information on how to delete the profile could be found, nor could any information on what happens with the profile or its contents in case of a deletion. To get information on this one has to access an external website.

*Principle 4”Provide easy-to-use mechanisms to report violations”*

*In the Self-Declaration:*

All of Microsoft's online services are said to have a mechanism for reporting inappropriate content and/or contact. Generally, the mechanism is said to be easily accessible and understandable to all users, and that reports are acted upon quickly. The declaration does not indicated that the reporting procedure is age appropriate or that reports are acknowledged, or that the users are given indications on how such reports are typically handled. In addition, for the Xbox Live service, specific reporting mechanisms are said to be in place. No information is provided on their accessibility.

*On the site:*

When signed into the Windows LIVE profile, a link for reporting abuse or content that is violations of terms are visible on what is perceived to be the relevant sites, but is not visible

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<sup>2</sup> After the test was performed Microsoft informs: “Without knowing if the default permissions were changed for the testing profile, or the permission setting on other user profiles, we’d assume the minor may have always had their birthdate correct representing themselves as 11. In addition, all minors across regions initially get default settings to My Network (...). However only Family Safety Settings (FSS) under 18 accounts are actively prevented from opening up those permissions to Public. Similarly, the account this minor is using may have been created with an adult birthdate initially, but then the birthdate was changed to that of a minor. Adult defaults are broader than those given to minors, and these are not reset if the birthdate changes”. The tester notes: during the testing the permission settings were not changed (unless to restrict more) during testing, and the account was created initially for the child.

all the time (e.g. could not be found when signed into the “account” and “home” sections of the profile), in contrast to the statement in the self-declaration: “a ‘report abuse’ button appears at the bottom of every windows live social networking service window”.<sup>3</sup>

The button is easy to find, but is not considered easy to understand, especially for children, as the form to fill out is very technical. The form also does not allow for general safety enquiries, just report of specific incidents, as a URL to the specific incident must be provided and one cannot submit the form without filling out all the sections. Also a readymade list is provided for what type of incident one is reporting, not allowing for a potential “other” request or concern.

It took just under 24 hours to get feedback on the report sent asking for help. The reply from the Windows Live support team asked for more information regarding the specific incident, such as a clear description of the violation, profile or space name and a copy of the offensive message in order for it to be investigated further. No general information on safety issues or referral to other organizations that might help was given.

In Xbox Live, reporting violations is on a per-user basis, specifically during play or after receiving messages. The process involves pausing play and calling up the player list, thus requiring basic skills in using the Xbox system. For reasons described in the introduction, the reporting process was not fully tested in Xbox Live.

Blocking friends and/or requests is easy.

*Principle 5 “Respond to notifications of illegal content or conduct”*

*In the Self-Declaration:*

Microsoft states that for all their online properties they have robust, easy mechanisms for reporting abuse, and that they respond quickly to reports of abuse, including those involving potentially illegal content or behavior. This includes cooperation with law enforcement and government agencies. No information was provided regarding cooperation with other services such as Inhope.

*On the site:*

The reporting mechanism was not tested for illegal content or contact. No information could be found regarding organizations such as Inhope on Windows LIVE or the general Microsoft Family Safety site.

The reporting mechanism in Xbox Live was not fully tested due to reasons described above. The initial procedure was however, easy to understand, once one could find the mechanism itself.

*Principle 6 “Encourage users to safe use of personal info and privacy”*

*In the Self-Declaration:*

According to the self declaration a range of privacy setting options are provided for users

- When users visit their profile, they see their own view of the profile, which always includes all of the information they have entered about themselves and a list of all of their activities
- the implications of automatically uploaded information provided during registration onto profiles have been considered
- users are notified when the information used to register is automatically uploaded onto their profile
- when information is automatically uploaded to profile users are able to edit and make public/private that information where appropriate

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<sup>3</sup> After the test was conducted Microsoft clarified that report abuse mechanism is required ONLY on pages where user generated content is visible to the public (i.e. to others besides the poster of the content).

- indicate that privacy options are supported by information that encourage users to make informed decisions about the information they post online

The self declaration does not:

- address the issue of third party applications

*On the site:*

On Windows LIVE one can easily change one's privacy settings. Registering for the service one was asked to provide a wide range of personal information. Information like first and last name, year of birth, postal code and similar were required to register. All privacy settings can be changed once logged in. When searching for the testing profile of 11 years from the testing profile of an adult, information like name, picture, where one lived and interests came up with no restrictions.

Similarly, changing your privacy settings in Xbox Live is easy. Only date of birth and e-mail address is required. No statement is given as to whether these are inserted into the profile, they are however not visible. The self-declaration states that "Other than the username selected for the Windows Live ID, the pieces of information in a profile remain separate, with no automatic mapping taking place". This seems to be accurate.

A wide range of information could be registered/entered when logged onto the profiles, such as relationship status, hobbies, sense of humor, taste in music/films/movies etc. In Xbox Live, this is in the form of free text, and is not searchable.

No information was found on third party applications (nor was this addressed in the self-declaration report).

When trying to change settings for permissions in Windows Live, e.g. clicking the "permissions" under the blog post option under "invitations and communications preferences" column on the "permissions" site, only send you back to your own profile, giving a circular reference.

*Principle 7 "means for reviewing illegal or prohibited content/conduct"*

In the self-declaration it is generally declared (including both Windows LIVE and Xbox Live) that Microsoft employs human and automated forms of moderation, in addition to user generated reports. No details as to the type of technical tools are provided.

No information is provided regarding community alerts. No information is provided that steps are taken to minimize risk of employing candidates unsuitable to work with real-time contact with children for human moderators.- please see the other remarks sent via email

*This principle was not tested on the services.*

## Conclusion

### For Windows Live:

**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	<i>Not Tested</i>				
6		x			
7	<i>Not Tested</i>				

**For Xbox Live:**

**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	<i>Not Tested</i>				
6	x				
7	<i>Not Tested</i>				

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