

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

Bojana Lobe, University of Ljubljana

Introduction

MySpace.com is a social networking platform that allows users to create unique personal profiles online in order to find and communicate with old and new friends. The minimum age requirement to become a member is 13. The services offered by MySpace include any MySpace-branded URL (the "MySpace Website"), MySpace messaging services (including, without limitation, instant messaging, private messaging, and email services), MySpace music and video services, MySpace developer services, MySpace mobile services, and any other features, content, or applications offered from time to time by MySpace in connection with MySpace's business (collectively, the "MySpace Services").

The following is a report based on the testing of social networking service MySpace. It was tested at the main British English site (uk.MySpace.com).

Summary of findings:

- Safety information is available to all, also those not signed up.
- The safety information is extensive, targeted specifically to teens, parents, teachers and general users.
- Parental control tools are extensive and easy to understand.
- Report mechanisms are efficient and visible at all times.
- Users are provided with various tools to control their privacy settings.
- Minors are not searchable through search engines.
- A number of effective processes are in place to expeditiously review and remove offending content upon receipt of notification of alleged illegal content or conduct

Testing results:

Principle 1 "Raise Awareness"

In the Self-Declaration:

The self-declaration (even though under Principle 2) includes information on Terms of use. It also includes safety information.

The provider also indicates that the safety information is targeted. Amongst other, the provider states that users under 18 receive security warnings before posting content, users under 18 must review Safety tips before registering, they mention parental safety tips and MySpace Parent Brochure as well as School Administrator's Guide to Understand MySpace

and Social networking Sites. Further, the provider has run education campaign through MySpace and also through third party partners, such as National School Board Association, and are steering group member of Teach Today initiative.

The provider also states that there is a “safety tips” link on every page (that makes is accessible), which includes links to parent monitoring and blocking software. However, the provider does not specify whether the safety information is presented in a prominent way and a practical format nor whether it is easy understandable.

Also, the self-declaration does not state that the safety information provides guidance regarding inappropriate content and conduct and information on the consequences of breaching the Terms of Service.

On the site:

In **MySpace** both the Terms of use, Safety Policy and Privacy Policy are very easily found on the site. Safety Policy and Privacy Policy are visible when entering the site (at the bottom). It is also easy to find the Safety Policy and safety tips/information for children, parents and teachers as well as links to educational material or organizations active in child safety. Safety tips/information to parents, teachers and children is very easy to understand and to access. It is also very exhaustive. For example, the safety information for teens contains the instructions on how to use safety settings, safety tips, information on cyberbullying, links to get more information to help you stay safer online specifically targeted at teens and information on how to contact MySpace. The information for parents and educators includes the above information as well as the information on how to create and delete the account, how to talk to teens about Safer Internet Use and some basic information on MySpace.

The provided information is in textual and in audio/video format. It also provides concrete and anecdotic examples of use (e.g. why it is not smart to publish anything that can embarrass a teen later, why it is not wise they are older as they are etc.).

Beside specifically targeted information to the core three groups, MySpace also provides many external links to organizations that are working toward increasing awareness of Internet safety and teen health as well as links to Internet safety Experts (such as Wired Safety. Safe Kids, Safe Family etc.). All this information, together with ParentCare software (which was developed by MySpace itself) and some additional links to external software downloads s provided in the category “more resources”.

The Terms of use clearly list content and conduct that are not allowed, as well as the consequences of engagement in prohibited behavior are listed. The minimum age required is \mentioned in terms of Use ad well as in the safety tips for teens.

In general, information on the following specific risks is found: hate speech, violence, bullying and divulging personal information. Even though the risks of seeing of being the subject of child abuse images or posting sexually provocative photographs are not explicitly mentioned on the site, they keep warning teens in the safety tips not to put photos that can embarrass them or expose to danger.

Principle 2”Ensuring Age Appropriate Services”

In the Self-Declaration:

The self-declaration provides information on how it is made clear to users where a minimum age applies (stated in their Terms of Use), it also outlines the steps taken to delete under-aged users (they employ search algorithm currently to seek and delete individuals misrepresenting their age and actively search out underage users by hand) or to deny access and to prevent

under-aged users to attempt and re-registering with a different account (the use of session cookies).

Further, the provider states they work closely with commercial content providers to ensure the users have information about the content to make informed choices. These might come in the form of warning messages, restricting content based on time of day. The provider also mentions application security steps they adopted and a number of steps taken to protect younger users from inappropriate content. Further, the provider mentions that inappropriate URLs are blocked and not being posted on the site. However, the self-declaration does not outline how it is made clear to users when services are not appropriate for children and young people.

The provider does also address in the self-declaration how uptake of parental controls is promoted on the service. They developed a software, ParentCare Beta, which is a free, simple software tool designed to help parents safeguard their teens. With ParentCare Beta, parents can determine if their teen has a MySpace profile and validate the age, user name, and location listed by the teen.

Also, they state there are safety tips link on every page, which include links to parent monitoring and blocking software.

On the site:

When signing up to the My Space, no age verification is needed, meaning one does not have to explicitly state (or tick a statement) that the user signing up is above a certain age. The service requires one to provide their full birth date. Also, email verification is needed. The attempt to sign up as a 11-years old failed as the users below 13 are considered under aged. The provider installs a cookie on the computer of the user to prevent them from trying to sign up with a different age. However, once the cookie was removed, the sign up as a 15-years old was successful.

On MySpace, the links to various parental control tools can be found. The software Parent Care can be downloaded from the site, and several FAQs are provided on how to install and handle the software as well as how to lock or delete the teens account. This makes the software easy to understand. The available parent control tools are considered efficient.

Principle 3 "Empower users through tools and technology"

In the Self-Declaration:

The provider lists a number of steps taken to protect younger users from inappropriate contact. Amongst many others, these can also be found:

- New profiles for under 18 are automatically set to private;
- No user can browse for under 16s;
- Adults can never add under 16s as a friend unless they know their name or email address;
- If under 16s override their privacy settings they are still only viewable by other under 18s;
- Under 18s can block all over 18s from contacting them or viewing their profiles;
- Under 16s are tagged to be un-searchable by age in search engines;
- Over 18 are limited to their ability to search in the School section.

The provider further lists a number of tools provided to all members. Amongst many others, they also state that all users can set their profiles to private and can pre-approve all comments before being posted. Users also have the chance to conceal their online status.

The provider does not mention how it educates parents about available tools.

The provider does not state whether the users have the option to allow only direct friends to post comments and content to their profiles or whether they have the option to delete unwanted comments of other users. But as mentioned above, the users have a chance to pre-approve which inherently include the possibility to delete even though the provider does not state that explicitly.

The provider also states that it provides tools to report inappropriate content or behaviour (more in Principle 4 as it is stated there).

On the site

The information on how to report abuse or bullying, how to block other users from contacting you, the information on the possibility to specify who or which groups of users that could contact you can easily be found on the site. However, the information on restrictions on search options for profiles was not found.

Once signed into the profile, the user is able to delete/remove posting and photos on their profile as well as those they put on other profiles.

Other users cannot post comments on the profile as only users' friends have this possibility, if the user account is set to private. Personal information (the one user decides to share) is visible to other users by default and one has to change privacy settings to make it only visible to friends. For under 18s the settings are set as default to private (which means friends only). Further, if under 16s decide to override their default privacy settings they are still only viewable by others under 18. In the safety tips for teens, the provider recommends and offers clear steps on how to set the profile visible to only friends.

The user also has the possibility between choosing online, hidden, or offline status when signed into MySpace. One can also decide to whom one wants to be available for IM (e.g. to only MySpace contacts or all under 18 etc.). The user is also notified when tagged in a photo by friends but does not have a chance to approve the photo before being published. One can remove a tag later.

Safety tips and/or guidance about publishing personal information or a photo on the profile is also provided every time the user wants to edit their profile. Also, when signing in, one gets the info about safety tips before posting any personal information of a photo. Also, on the photo upload page there is a link to the photo policy, which among other things it states: For security and privacy reasons, any image that contains personally identifiable information such as name, phone number, email address or web site URL is not permitted.

In case of attempt to cancel the profile, information can be found in the Privacy Policy page.

There is also a clear link provided in the account-setting page that enables account cancelation. When cancelling the account, the user is asked for a reason as MySpace claims to collect this information in order to improve their service. The profile can be permanently deleted. The provider does not state any information about what personal information is collected/retained after cancelation of the account or how it is used.

The underage users can search for users their own age (16 and below) and are not searchable through search engines.

Principle 4 "Provide easy-to-use mechanisms to report violations"

In the Self-Declaration:

The provider states in the self-declaration, that a report abuse procedure can be accessed from every MySpace webpage and whenever user generated content appears. Users can also report:

- Inappropriate content or behavior to MySpace;
- Spam email complaints to MySpace;

- Sexually explicit conduct directly to NCMEC’s CyberTipLine;

The provider further states that the reports of abuse are acknowledged immediately and acted upon expediently by dedicated teams.

However, it does not say whether the mechanism is understandable to all users and age appropriate. The self-declaration does not indicate that the users are given indications on how such reports are typically handled.

On the site:

When signed into MySpace account, a link for reporting other users is visible at all times (at the bottom of the page of other users as well as friends). A clear link on the user page is provided to report abuse or block friends or any other users. The information on how to report a friend is found in “using safety settings’ section. Also, one can decline a contact’s request. The link/tool where one can report abuse/violation of terms is also visible at all times. However, one can report photos or videos but not comments. The button to report photos or videos is easily found below them. The report mechanisms are in general easy to understand. When the report is sent, one immediately receives the message: “MySpace Customer Care will review the reported content against our Terms of Use for violations and take any necessary action.”

To report a user, a test was done. On Myspace, one can report a person, a photo, etc., but there is no general button for report in which one could include the general “Someone is sending me scary messages” report or at least it has not been found. To avoid falsely accusing a real person that is sending a scary message (not just someone, as planned in methodology), one of the profiles created for this exercise was reported for being underage (the reported profile was the underage profile used for registering to MySpace first as an 11-year-old and, when access was denied, as older).¹ A notification about the actions taken as a result of the report has been received within one day on the email address of the user but not in the inbox of the Myspace profile of the user.²

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

In the Self-Declaration:

The provider states a number of effective processes are in place to expeditiously review and remove offending content upon receipt of notification of alleged illegal content or conduct:

- The Customer Care Team handles sensitive issues;
- The Content Assurance Team ensures integrity of safety systems and flags potential issues;
- The Security Incident Response Team has a dedicated security team that works to identify potential problems and takes immediate action when security issues occur;

The provider further lists arrangements in place to share reports of illegal content or conduct with the relevant law enforcement bodies and/or hotlines:

- The Parent Care Team provides a dedicated parent hotline;
- The School Care Team provides a dedicated educator hotline;
- The Law Enforcement Team provides a 24/7 dedicated hotline;
- They have established working procedures with NCMEC;

¹ The message from methodology was also sent at a later stage to report a grown up sending scary messages and there has also been the same response from the provider as in the first instance.

² Due to this, the reply did not reach the tester, but after consulting with the SNS it is clear that a reply was sent and was later found by the tester.

- They provide ongoing support to local, state, federal and international law enforcement;
- The Law Enforcement Guide and One Sheet have been created to help law enforcement
- Agencies understand MySpace and investigate cases.

On the site:

The reporting mechanism was not tested for illegal content or contact.

Principle 6 "Encourage users to safe use of personal info and privacy"

In the Self-Declaration:

Regarding encouraging users to employ a safe approach to personal information and privacy, the provider refers to Principle 3 where there is an extensive list of what user can do (please see the Principle 3 section in this report).

In the Principle 3 the provider also addresses Application Information and data collection, where amongst other things it states that all applications are governed by the same privacy controls that are in place for members. MySpace is also stated to take actions against the applications that violate safety and security requirements.

On the site:

On the site one can easily change one's privacy settings. At the registration, the user is asked to provide age, email, gender and real first and last name. Optional, user is asked to provide school or workplace information and a photo. A range of other information can be provided once registered by the user if wished so (political views, religion, relationship status, interests etc.). However user is notified with privacy warning before sharing any additional personal information on the profile.

From the provided information at the registration, the age, real name, and gender are automatically inserted into the profile. If user provided a country information at registration, that will also be inserted. Other information is inserted once the user provides it (if decides so). It is also clearly stated when a user signs up "your first and last name will be displayed publicly. One can hide one's real name after one sign up by clicking my account Also, applications (3rd party, external or additional programs and/or services) need permission from the users to be installed and/or pull info from user's profile.

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

In the Self-Declaration:

The provider refers to "Protecting Younger Users from inappropriate Content" and "Dedicated MySpace teams" in Principles 2 and Principle 5.

In "Protecting Younger Users from inappropriate Content" the provider also lists:

- All hosted images and videos are reviewed for compliance with Terms of Use, these images are
- then hashed to ensure they cannot be reuploaded.
- Inappropriate URLs are blocked from being posted on the site.
- User accounts are deleted for uploading pornographic videos.
- Alcohol related ads are not targeted to under 18s.
- Smoking/Drinking preferences are blocked for under 18's.
- Groups and classifieds are reviewed when inappropriate content is suspected.
- MySpace works closely with commercial content providers to ensure that users

- have the information necessary to make informed choices regarding content. This may come in a variety of forms for example, warning messages, restricting content based on time of day etc.

In “Dedicated MySpace teams” the provider also lists:

- The Customer Care Team handles sensitive issues;
- The Content Assurance Team ensures integrity of safety systems and flags potential issues;
- The Security Incident Response Team has a dedicated security team that works to identify potential problems and takes immediate action when security issues occur;
- The Parent Care Team provides a dedicated parent hotline;
- The School Care Team provides a dedicated educator hotline;
- The Law Enforcement Team provides a 24/7 dedicated hotline;

On the site: This principle is not tested on the site.

Summary of results

A. 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				

B. 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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