

**Implementation of the Safer Social Networking Principles for the EU:
Testing of 20 Social Networks in Europe
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NASZA-KLASA.PL

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Nasza-klasa.pl (Our-class.pl) is a social networking site gathering Internet users who want to find their classmates from every level of education. Its aim is to enable and rebuild contacts with colleagues, from kindergarten to high school or college. It has been operating since November 11th 2006 and was created by four students. It's one of the most important and the biggest social networking services in Poland now with more than 20 million profiles on its website. As said in the self-declaration: "Nasza-klasa.pl offers many social features which help people "stay in touch". Users can create their own profiles, join school and class profiles, gather their friends, send internal messages, upload photos, leave comments on profiles and under photos and chat with friends via the forum".

The test was being done since October 28th till 30th by using two nicknames: Maria Kowalska aged 11 and Maria Nowakowska, aged 15. There's no minimum age to use the SNS in a Terms of Use.

The service is only three years old but it is very popular in Poland. Comparing to the self-declaration, it's still in process "of building" the area of safety for users under 18. It's not necessary for person under 18 to have any permission from any adult (e.i. parent) to set a profile on nasza-klasa.pl. It's not even asked on the website to give any contact e-mail to adult when setting the profile.

It's also necessary to accept the Terms of Use, of which some are for sure difficult to understand for children. In turn, they are repeated in some important places of the service, on the website and for example when publishing photos, with the information that obscene photos, which violate manners and morals will be removed from the gallery.

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

One can say that the provider create very clear or clear information about terms of use, safety policy, policy information and information for children and parents. It was difficult to find the information exclusively for teachers, but there are links to organizations active in child safety. That information is placed on the website and easy to understand for parents, and for children and teenagers. This information is provided as general textual and video info, as concrete examples. There are also external links to professional safety organizations. The Terms of Use list content and behaviour which is forbidden and consequences of engagement in them, but it's not very easy to understand for children and young people.

Instead, there is a clear information on the website (not in Terms of Use) about specific risks regarding using online services, like hate speech, violence, bullying, no information was found about self-harm actions.

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

- it's necessary to say that the Use of Terms clearly state that a person under 18 must have adult permission to use nasza-klasa.pl. There's no other info provided in self – declaration about this. There was no problem to set up the profile as a 15 years old girl, because the provider does not ask for any adult's permission and does not delete persons under-age. The service allowed to sign up as 11 and 15 years old because it is not age restricted.

It was easy to find the information for parents on the SNS site about the problem of safety, how to contact the police, how to look for help in case of any danger.

When signing up as an adult the SNS requires to submit birthday data and e-mail for verification – it's impossible to sign up without clicking on a verification link sent over the e-mail.

Principle 3: "Empower users through tools and technology".

In self – declaration provider informs that children and young people are assisted in their experience on their service: they are provided with necessary tools which let them control relations they make through the service: they can hide their profiles and make them invisible for search engines, they can reject friends request, put unwanted guests on the "black list" (block them), remove unnecessary comments, quickly report photos that violate the Terms of Use. It's also possible to find the information on the social networking site on how to report abuse or bullying, how to block other users from contacting me and to specify who or which groups of users can contact me.

When using one's profile it's possible to delete or remove some postings and photos on the profile, and on other people's profiles, but it's necessary to have their permission. Not everyone can post comments on one's profile (only the friends).

When signed to the user profile: the personal information is not visible for all other users, but only to my friends, to change this it's necessary to change settings on one's personal information.

When about to upload a photo on my profile one gets safety tips about publishing photo, nothing when publish information.

It's not known (or it does not say) if you're notified when you're identified in pictures posted on other peoples' profiles when signed to my user profile.

It's easy to find information on how to delete or deactivate my profile, but it's not known (or it does not say) if possible to deactivate one's profile or delete it and there's no information what's going on with my personal information the sns collects after deleting or deactivating.

The tester was told that the user is supposed to contact the Customer Service, but such information was not found for users on the site itself.

Principle 4: "Provide easy - to - use mechanisms to report conduct or content that violates the terms of service".

In self – declaration the provider indicate the information about Customer – service, working 24 hour per 7 days to resolve problems and abuses reported by users. There's no information on how that reports are acknowledged, are acted upon expeditiously. It also informs in self-declaration that the service co – operates closely with lawyers and police officers to develop their skills in legal matters.

When signed to profile, one can easily find information on where to report other users that bothers me, how to report bothering content, how to block a friend/ contact request and a link where to report abuse/violation of terms visible at all times when signed into the SNS. When one is signed into profile, can block a friend and decline a contact request.

There was information sent to the SNS asking for help because of being sent a "scary messages". The system immediately sent a notification to user when a report has been sent and how a report will be handled. After sending an e-mail with the sentence about "scary messages" as Maria Nowakowska, aged 15, one gets the answer that the message was

received and it usually does not take more than 48 hours for the reaction. The message was sent on October 30th and the sns claims to have sent the response on November 3rd but it hasn't been received.

Principle 5: "Responding to notifications of illegal content or conduct",

is well described, easy to find (less than 15 seconds) and easy understand for children and young people.

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

is also well described in the self – declaration of the provider, which informs that there's a Privacy Policy of the service describing what data is collected, why and how it's collected and where and when users can manage it and that there are three main privacy settings: open profile, private profile and close profile with a possibility to customize individual privacy settings.

When signed to profile, one can easily change privacy settings. When registering to the sns one's asked to provide: real name (first and last) age and e-mail, without any other questions. Into profile there was automatically inserted real name, the age is hidden for people under 18. The adults can decide whether they want or not to insert their age.

When signed as an adult one can search for other profiles where one test as an 11/15 years old and is able to search for users profiles that are 16 years old or younger, but only when the name or nickname and place of living are known. When use search engine and search the nicknames one's able to find the profiles that he/she was registered as a minor in the SNS.

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

is well described in the self-declaration too. Nasza-klasa.pl is supposed to use human and automate forms of moderation, utilize technical tools such as filters to catch illegal comments, data and subtitles and employ user-generated reports which are made thanks to special buttons such a "report abuse".

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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