

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

PICZO

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Introduction

Piczo, according to their self-declaration, allows members to “share their life stories with friends by designing their sites with multiple pages featuring photos, graphics, videos, music, comment boards, games, and more. Each site can be linked to other friends' sites and members can interact with them and their friends, and meet new people online“.

I found that Piczo allows users to create professional looking websites without requiring technical skills. I was able to develop a personal websites using a user-friendly WYSIWYG (what you see is what you get) editor. I was able to create my own website and add items such as images, text content, videos, comments, and connections to other websites in the Piczo community.

Summary

The self-declaration provided by Piczo was largely in-line with the Safer Social Networking Principles. However, some discrepancies' arose during testing. The functionality of the site seems at variance with the description in the self-declaration. It seems that the self-declaration refers to a previous version of the website which was completely overhauled between the submission of the self-declaration and the testing of the site.

While it appears that the functionality of the site has been changed the safety advice and user documentation on the site has not been updated and still refers to the previous version of the site. For example, the self-declaration refers to parental controls for users under the age of 13, while the live site does not permit users in this age group and consequently there are no parental controls available.

The service appears to be more a blogging than a social networking platform. It features user-generated blogs and websites, in a twitter-style approach, allow users to update their feeds and follow other registered members. Each site or blog can be linked to other members' sites.

While other social networking sites offer blog functionality as an additional feature, blogging is the main focus of Piczo.

Testing

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

According to their self-declaration, Piczo has developed a robust Safety education page which is located off the Homepage, linked in the footer, and called out during the Registration process. The footer containing links to Safety, Privacy and Terms of Service are available on all pages within the sites.

A hyperlink to a **Parents** page was found on the footer on the homepage. This link is in a font size larger than the text on the homepage. However this link is not immediately visible when the homepage loads. The user must scroll down twice in order to see the footer. On the **Parents** page prominent links to an FAQ for parents and a Parent's Guide from a third-party online safety organization were discovered.

The content on the **Safety** section of the site was found to be child-friendly. It has short safety tips accompanied by supporting graphics. There are prominent tips on the safety page encouraging users to respect others and never share personal information. It also has links to sections of the site with more information such as a **Safety FAQ**. This FAQ steps through how to report abuse and configure moderation and blocking settings on their profiles.

Both the **Parents FAQs** and **Safety FAQs** were obsolete at the time of testing. The content on the **Parents FAQ** and the **Safety FAQ** seemed to relate to a previous version of the site. In the Piczo self-declaration there is reference to the periodic safety and security campaigns run with partners and information regarding privacy options that are displayed before posting content; neither if these measures were in evidence on the site.

Piczo's claim to provide safety information for parents and young users was validated; however no material specifically targeting teachers was found. 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 which is semantically dense and includes legal and technical jargon.

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

Piczo rely 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. If the date of birth entered by the user during registration indicates that they are below the permitted age, they are prohibited from registering. A cookie is place on the user's machine to prevent them from reregistering using a different date of birth.

Piczo 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). They claim to 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 say they remove the accounts of users for excessive and/or repeat offences. Piczo says that images that break their TOS are hashed to ensure they cannot be uploaded again. No pornographic content was encountered during testing.

The Piczo submission states that users who declare themselves as younger than 13 must have parental approval via a confirmation email before being allowed to access the service. While testing, it became apparent that Piczo had changed their policy in this area since submitting the self declaration. Piczo made claims about segregating members into over 13 and under 13, with the under 13 service being Children's Online Privacy Protection Act (COPPA) compliant. During testing, it was not possible to register as an under 13 and a cookie was placed on the machine preventing re-registering as older. Piczo also claimed to provide monitoring tools to parents of children under the age of 13 to monitor what their child is doing on the service. These tools were not found on the site during the testing period.

Principle 3: Empower users through tools and technology

Piczo claims to have taken measures that can help minimise the risk of unwanted or inappropriate contact between children and young people and adults. They claim that websites and profiles of members under the age of 16 cannot be found by searching for them using search engines.

All websites created on Piczo were found to be private in the sense that they are not locatable by other when they first register. Members must take deliberate steps to alert others of their website address. Piczo claims that users can set their websites to one of five types of privacy

settings; the world, the Piczo community, Friends Only, Password Protected, or only viewable by site owner. This feature was not found during testing, but only after comments from the SNS. It seems that the only restrictions on accessing websites or commenting on them are based on the assumption that only users with whom the url of your website is shared will be able to locate it. It wasn't possible using an adult account to access and comment on the website created using an under 16 account without any restrictions. In fact, it proved to be impossible to configure the website created by the under 16 to restrict who could access or comment on the site.

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

I found that Piczo provides prominent mechanisms for reporting inappropriate content, contact or behaviour. These mechanisms are, as they claim, easily accessible to users at all times and are easy to use. However users are not given information about how their reports are being handled nor are they given any feedback on how these reports were resolved. Piczo has a prominent link to a **Report Abuse** page on the footer of all pages on the site. Links to information about how websites can be configured to deal with the abuse were found on the **Report Abuse** page. Piczo states that it provides an Abuse Hotline and a dedicated email address which parents and school official can use to contact Piczo.

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." To do this a form was completed that allowed the reporter to provide personal details and details of the abuse. There was context specific advice in the comment field detailing what information should be included to make the report easier to act on. When the report was submitted, text was displayed on screen indicating a report has been sent. However, no specific communications in response to report indicating how the report would be handled was received. No feedback on the outcome of the report was provided. No reference number was provided that could be used to follow-up or track the report.

Principle 5: Respond to notifications of Illegal content or conduct

Piczo recognizes the importance of working with law enforcement in their declaration and outline the processes they have in place to review and remove offending content. They claim to have in place arrangements to share reports of illegal content or conduct with the relevant bodies.

Piczo mentions that it has established working reporting procedures in place with NCMEC and CEOP. They mention mechanisms they have in place to support law enforcement with investigations and prosecutions. Piczo has created a dedicated page on its service for law enforcement that includes a separate contact form and a guidebook on how to contact Piczo for information and relevant support inquires. Piczo also operates a hotline for law enforcement with a 24/7 answering service.

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

In the declaration, Piczo describe 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 claim the options outlined are prominent in the user experience and accessible at all times.

According to their declaration, "Members can set their websites to community only, friends only, password protected, or private. When contributing content to the community, members can do so privately. Members can set comments to pre-approve prior to being posted. Members can block other members from contacting them or viewing their site. Members can hide their online status. Members can see the privacy setting for the site and any pages on

theirs site in the page name list when editing. Members can quickly edit their privacy here as well. Members can enable right-click protection on images on their site. IM is set to Friends only. You must be a friend with a member before you can IM them.” These measures were not encountered when using the Piczo website. The functionality of the site as described in the declaration was different to the functionality encountered during testing; some measures like the IM could not be tested as they are no longer part of the SNSs services. It proved impossible to configure access when contributing content to the community. Nor was it possible to set comments to pre-approve prior to being posted or block other members from contacting or viewing a site. It was not possible to edit privacy settings. The details relating to privacy seem to relate to a previous version of the site. User’s privacy was only protected by the fact that you need to know the exact URL of a Piczo member in order to see their site. Despite Piczo having few measures in place to protect user privacy, they request very little personal information during the registration process and visitors to Piczo cannot search and find any user sites. Only email and age details are mandatory during the registration process and gender, pictures and name fields were optional. Piczo members’ sites don’t show up on search engine websites.

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

Piczo 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. Piczo don’t use human moderators that interact in real-time with children. They do detail the measures they take to promote compliance with the TOS.

Piczo claim to use hybrid technical and human content moderation solutions to identify and remove any content or members that break their Terms of Service and Acceptable Use Policy (TOS). They say that images that break their TOS are hashed to ensure they cannot be uploaded again and that 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			No material specifically targeting teachers was found.
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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