

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

RATE.EE

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Introduction

The largest and most popular SNS in Estonia rate.ee has more than “300,000 active users comprising a one fifth of the population“ (Self-Declaration, point 1). No information about the age restrictions is provided in the Self Declaration.

The site was „launched in 2002 offering a simple picture rating service it has since grown to a fully fledged online community featuring friends’ lists, blogs, albums, and many other services“(Point 1). The website provides the users with additional opportunities e.g. rating the photos of others, sending messages to other users, chatting in forums, keeping a blog, reading horoscopes, converging among different communities, playing games, etc. Several other advantages (e.g. upload one’s photos to the site before the others; get a VIP status in a chat room, use the Compatibility-Meter in order to test one’s compatibility with certain users from the opposite sex, etc) are made available for the users who have purchased SOL’s, the monetary unit only applicable on the *Rate* website. People in all age-groups can become users of the site, no minimum age is necessary.

Compared to some other SNS that are mostly focused on networking as such, most of the users of *Rate* are foremost interested in being rated and rating others. The majority of the users are hoping to gain positive comments and points for their profile images accompanying the textual parts of the profile in order to enlarge their fame inside the community (% of fame of every user is provided on their profile) as well as to gain a place in one of the numerous popularity charts created on the site (e.g. “TOP 100 of the most famous users”, “TOP 100 of the most popular dates”, etc.). Every user of the site is able to view profiles and profile images of others and rate and comment them according to their preference.

Date of the test: Test was performed from 26. – 28. October, 2009

Main findings:

Rate has taken steps to ensure their users safety, foremost by providing the users with an opportunity to report about inappropriate content and behavior. Nevertheless, considerable gaps in the safety issues have remained e.g. without being a user of the site, one can access all the profile images and the majority of textual parts of the profiles of all the users; re-registering to the system is very easy; users can block their profiles altogether but not all information could be made “private” to friends only; no additional safety measures have been taken to ensure the safety of underage users

Rules of Conduct and Safety Rules can be found easily however, the quality of informative materials for adults and children is really poor.

No parental controls are provided

The process of looking through the reports is quite slow and the quality of feedback moderators give to the users is insufficient

Additional information: As main idea of the site is closely connected with the profile-image rating, there was a need to have live photos of real persons up on profile for the time of the test. The live-photos were provided by the leading experts. However, none of the photos provided could be published on the three fake-accounts created for the test. The profile images of 11 and 14 year old girls were rejected by the administrator as the “image is too small or in a bad quality” (message sent to the profile account by the administrator). In case of the photo of an adult woman, an “authorization code” was needed (message sent to the profile account by the administrator). In order to get the “authorization code” it was advised on the site to take the following actions: “In order to get the code you need, turn for help from some acquaintances who already have photos up on rate.ee. They can order an authorization code you need from their profile. The procedure will cost them 100 bonus points, thus you have to ask very nicely☺. If you do not have an acquaintance here, then send a message to some nice user from the opposite sex and ask them out for a coffee. Then you’ll have a new acquaintance and may be also a code that you need. ;)” (<http://www.rate.ee/confirm.php>). After consulting with the leading experts, and making it sure that the test could be completed without having photos up on the site, it was decided not to pursue the authorization code and leave all the profiles without photos.

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

As suggested by the Principles, the site provider has stated in the Self-Declaration that “terms of Service are provided in a simple and easy-to-read format (<http://www.rate.ee/rules.php>) and are made available at the footer of every page.” According to the Principles, the site provider should have provided “clear information about what constitutes inappropriate behavior”, however, in the Self-declaration only “disclosing personal information of other people” is concretely stated to be prohibited. As recommended by the Principles, it is stated in the Self-declaration that additional educational materials are provided both for children as well as parents. No information about educational materials for the teachers is provided in the Self-Declaration. The information provided in the Self-Declaration is partially compliant with Principle 1.

In accordance with the Principle 1, the results of the test show that it is clearly indicated by the service provider in the Rules of Conduct what instances constitute as inappropriate behavior. Furthermore, a Report Abuse Button is provided under every photo, video, blog, comment, community, etc. up on the site. The system can be accessed and handled easily by all of the users. By clicking on the Report Abuse Button users can choose from a pre-given list of possible offences (e.g. inappropriate content, drugs and alcohol propagation, against Estonian law, etc). In addition a small additional report about inappropriate content found can be written which will then be forwarded to the administrators.

In accordance to the Self-Declaration, the site has provided an additional Safety page (<http://www.rate.ee/safety.php>). Although this page has two sections- for children and for parents- both of the sections have limited content and many safety aspects are left uncovered. No materials targeted to teachers can be found. In the section targeted to adults, it is advised that the parent should spend more time with their children in offline so that a trusty relationship is created with the child and thus, in case of problems in the virtual worlds, the child would ask from their parents for help. Parents are also advised to become users of the site, so that they could keep an eye on their child’s activities on the platform. However, no

information is provided what the parents should do in case something bad has already happened to their child; no examples are given what kind of instances could be viewed as harassment or improper behavior online, and no links/additional materials are provided where people could turn for help or gain additional knowledge on the topic.

Majority of topics where Internet conduct or content risks are involved are left uncovered also in case of suggestions for a child (no difference is made between children or teenagers). In a simple language it is advised that children should not to insert information, e.g. contact information, they would not want other users to see, however, no reference about inserting the name of one's school or inserting inappropriate interests to one's age, etc. is made. It is advised how children should proceed when wanting to meet with online acquaintances in offline settings. Nevertheless, no information is provided where children could turn for help; what kind of photos and personal data (e.g. school, home address, etc) would be safer not to upload; what kind of contacts to block or reject, etc.

Under most Frequently Asked Questions, an answer is provided to the question "Is it safe to use rate.ee?" In answer to that question it was reminded to the users that they should be careful about their nickname and password selection, so that there would be no occurrence of identity theft on the site. Nevertheless, all other dangers were left uncovered.

Raising awareness about safety measures taken by the service provider are partially compliant with the information provided in the Self-declaration.

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

According to Principle 2 in the Self-Declaration: "when registering for the service, all users are asked to enter their date of birth". It is also stated that "all profile pictures need the approval by site's moderators". In several aspects, however, the suggestions provided in Principle 2 have not been included in the Self-Declaration. For example, no information is provided about the steps taken to re-register as users; no information about age-restrictions or about the possible uptake of parental controls could be found either in the Self-Declaration or on the site. Although the provider has taken some steps in the Self-Declaration to ensure that the services are age-appropriate, the aspects stated are partially compliant to the Principle 2.

Based on the test results, when registering for the service on the site, it is stated by the provider that users need to activate their profile from their e-mail account. However, the need to active one's account only rose when wanting to make changes in the profile information. Without an interest to change one's profile information, a person could start using the site without actually activating their profile.

Furthermore, one does not need to be a user of the site in order to access and search all the textual and visual information available on the site. Both textual and visual information on the profiles, e.g. profile images, blogs, etc. could be accessed and viewed without the need to register as a user of the site. All the information (except the contact information and real name information i.e. parts of the profile which might have been made private on some accounts) can be found freely available about all the users, including under-age users.

On the site, it is declared by the provider that moderators work in order to find and delete fake-profiles. Nevertheless three fake-profiles were created on the same day from the same laptop, without any problems or a necessity to delete cookies. However, as declared in the Self-Declaration, none of the profile images uploaded on the site was approved by the moderators (cf. additional information).

Hence, the measures taken by the service provider to ensure the services are age-appropriate are partially compliant with the statements in the Self-Declaration.

Principle 3: Empower users through tools and technology

The service provider has not followed several important suggestions in Principle 3. For example, no indication has been made in the Self-Declaration about how to ensure privacy of under-age users; giving control to the users, about who can access their accounts; giving users an opportunity to have just their direct friends posting comments on their profiles; or providing additional educative materials for the parents. According to the Principle 3 of the Self-Declaration „Users have an option to delete unwanted comments on their profile page, users can block other users and reject friend request, users are able to report inappropriate contact,, Nevertheless, the Self-declaration is only partially compliant with the suggestions in the Principle 3.

The test results indicate that adult users of the site are able to search for information or contact under-age users. Profiles of children who are 7 years old or older (<http://www.rate.ee/search.php>) can be easily searched by adult users who are logged in to the site. Furthermore, besides the in exhaustive safety information targeted to parents, no additional tools for educating the adults as well as filtering or parental control tools could be found.

As promised in the Self-declaration users can block other users, reject friends' requests, delete unwanted comments and report inappropriate content. All of these options are provided as well as easily-accessible.

According to the test results, it cannot be specified by the users who or what type of people can contact them. Furthermore, although users can delete the comments they have received, no opportunity is provided to specify who are allowed to comment their profiles altogether. Thus total strangers, including users without a profile image, can post comments on the profiles of all the users, including under-age children.

Individual “ignore-list” can be created by every user of the site. The nicknames of users whom one has blocked as well as those users who have blocked the profile owner are made visible in the “ignore-list”. In order to “block” other users' one has to visit the profile of the person one wants to block and click on the button “block the user”. The user needs to provide a reason for blocking which is said to be visible for the person doing the blocking as well as the user who is being blocked.

Users can also block their profiles when clicking on a link on the profile edit page: “Yes, you can block your account from the page “your profile”. By doing so, your profile will be made invisible to the users (it will not appear in search results, etc.). In case you block your account and will not log in anymore, your account will be automatically deleted in two months time. During this period, you still have a chance to change your mind”(<http://www.rate.ee/faq.php>). Nevertheless, the above-mentioned wording suggests that blocking one's profile is something a person does mainly before deciding to quit using the service and less for the reasons of keeping one's profile “private”. Furthermore, users cannot make all the information available on their profile available to friends only.

Although additional improvements could be made, Rate has taken steps to empower users through tools and technology, and the measures taken are compliant with the ones stated in the Self-Declaration.

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

terms of service

According to the Self-Declaration users can report about “any picture that is inappropriate by using a Report Abuse button” and “report any received e-mail that violates the terms of service”. Users are “instructed to write at webmaster@rate.ee to report any violation of the terms of service”. The Self-Declaration does not provide any information how to make the reporting most efficient or how the report is acknowledged. As the abovementioned information could be found from the site itself (the service provider had described the aspects which needed to be specified in order the report to be processed by the moderators (i.e. stating the problem, nickname of the abuser, time of occurrence, copy of the content (e.g. abusive comment)), the Self-Declaration is compliant with the Principle 4.

The test results confirm that in accordance with the Self-Declaration, an easily accessible and age-appropriate reporting system, i.e. the Report Abuse button, is available in all different parts of the profile. In addition, a forum where users can post their questions and comments as well as a Customer Service Mechanism, are provided for the users. On both of the platforms, the problems and questions of users are answered by the moderators of the site. However, no information about webmaster@rate.ee could be found on the site and thus it was difficult to find a place where the message in Annex 2 could be posted.

Feedback to the problem “Someone is sending me scary messages” (Annex 2) was received on the next day through a forum. Feedback consisted of a response by a moderator advising: “block the person”. A response from the Customer Service Mechanism was received nine days later. First a message was sent to the profile saying “you’ve got a message from Customer Service”. On the Customer Service page the following reply was found: “Hallo! And who is this someone, include some of the messages. Regards, rate.ee team”. The reply was created 6. November, 16:16 o’clock.

Although Rate has taken steps to provide easy-to-use mechanisms to report conduct or content that violates the terms of service, the measures taken are partially compliant with statements in the Self-Declaration.

Principle 5: Respond to notifications of Illegal content or conduct

According to the Self-Declaration rate.ee moderator responds to complaints daily. It is also stated that the site cooperates with law enforcement agency provided with the complaint is filed with the police.

Users are informed on the site that the site cooperates with law enforcement agency; however no additional links to law enforcement agencies or other relevant services is provided.

As provided in the Self-declaration, the steps taken to respond to notifications of illegal content or conduct are compliant with Principle 5.

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

According to the Principle 6 a range of privacy settings should be provided and made prominent and accessible at all times. Furthermore, the provider should encourage the users to make informed decisions about their privacy settings and thus, the users should be able to view their privacy settings at any given time. The provider has stated in the Self-declaration that user privacy settings are prominently made available on the site and “contextual warnings are displayed throughout the site and confirmations are asked before user submissions“. Hence, the Self-Declaration is compliant with the Principle 6.

Based on the test results it could be claimed that privacy settings apply for certain textual parts in the profile e.g. e-mail, phone, additional contact information and one's full name. In all the other parts of the profile, including profile images, no information is provided how these aspects could be made "private" or available to "friends" only. The rule is applicable to all the users, i.e. no additional safety measures are used for under-age users. No safety information or reminders appear when choosing which applications to publish. A list of technical reminders but no safety reminders is provided when uploading one's profile images. One's full name, date of birth, email, gender, location and a photo of oneself need to be provided when registering for the services. All the aspects, except an e-mail and full name which are only available to friends, are apparent on the site when logging in. Although users can block the profiles so that they would be inaccessible for the others, the wording provided on one's profile edit page suggests that blocking one's profile is something a person does mainly before deciding to quit using the service and less for the reasons of keeping one's profile "private". Profiles of 7-99 year old users can be searched for without any age restrictions. When logged in as an adult, an in-depth search was necessary in order to find the under-age fake-accounts as the search engine automatically starts looking for people with photos (cf. additional information). Without that restriction, one of the fake accounts (11-year old girl) was found. It was stated on the site that in case the account name consists of a first name and a surname, it is more difficult for the search-engine finds to find the matching person. Furthermore, all information (except "private" information) is accessible also to non-users of the site.

When registering as a user of the site automatic permission is granted to the provider to use the information provided on the profile for their own purposes (not concretely specified). No information is provided about 3rd party users. Thus, measures taken are non compliant with statements in the Self-declaration.

Principle 7: Assess the means for reviewing illegal or prohibited content/conduct SNS Rate mainly use human moderation and user-generated reports in order to ensure community's adherence to rules. The Self-Declaration states that "hundreds of moderators are monitored by a handful of carefully selected super-moderators. Unsuitable moderators are replaced. Super-moderators are selected and monitored by the site administrator." Moderators help to keep discipline on the site, advise the users, provide information, etc.

(<http://www.rate.ee/moderators.php>). Moderator's approval is needed for all the profile images uploaded on the site. Moderators are responsible for giving feedback to the user-generated reports and removing all inappropriate content. Based on the assessment of the Self-declaration, the measures taken are compliant with Principle 7.

Summary of Results and Conclusion

Although rate.ee has taken several steps to ensure the safety and privacy of its users, additional improvement is needed in order to be able to state that the measures taken are compliant with the "Safer SNS Principles for the EU".

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				Several suggestions has not been adhered to Several suggestions has not been adhered to Information about how to make an effective report is provided on the site
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		One need not be a user of the site to have access to all the content provided by the users (except parts of the profiles made "private")
7	<i>Not Tested</i>				

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