

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

TUENTI

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Introduction

Tuenti is the most popular social network amongst Spanish teenagers. It is a private network, as a *by existing member invitation only* system is established to add new users. Every member of the SNS has several invitations, usually 10, to send to friends or relatives. Minors under 14 are not allowed to open an account.

According to the SNS self-declaration, this system allows users' control over the network and constitutes the main security mechanism that is built on users' confidence. In fact, only personal users are allowed to open an account: companies or institutions cannot have profiles. Commercial presence is limited to organizing events that users are invited to take part. In its self-declaration Tuenti declares to work with public and private institutions with educational goals in order to increase users' security online. Besides that it also mentions that users profiles are not indexed on search engines, as Google, in order to protect their privacy. As other SNSs Tuenti offers the most common utilities: personal profile pages, photo and video uploads, personal messaging and chat.

The test was performed October 27th 2009.

Self-declaration does not refer to any specific educational resource provided by Tuenti for parents or educators and relies very much on the by invitation and self-controlled model that Tuenti proposes. The SNS seems to rely too much on users and does not describe the proactive attitude it could take to make this principles a reality. Most of the relevant information is included in the Terms of Use, a document available only to users.

In general, Tuenti's self-declaration could be improved in order to get a closer accomplishment of the Safer Social Networking Principles. Besides that, what Tuenti declares on its self-declaration is only partially present on its website.

Reporting on testing results:

Principle 1. Raise awareness of safety education messages and acceptable use policies to users, parents, teachers and careers in a prominent, clear and age-appropriate manners.

Tuenti does not include any reference to its terms of use on the self-declaration, that appeals to confidence as the best tool for security. The SNS does not explain how it is going to assure that users confidence drives to real security.

Most of the relevant information regarding this principle is included on the Conditions and Terms of Use, but this information is available only for users. The terms of use are more than 8 pages of text that combines some sentences that use an age-adapted language with others using legal and not so easy to understand expressions.

Regarding the information for parents or educators, Tuenti does not provide any information on its website for these groups. It is stated on the self declaration that "*Tuenti works in*

permanent collaboration with educational institutions in order to disseminate online security policies by using a series of tools made available by Tuenti, along with specific education on our general privacy principles. Furthermore, Tuenti collaborates with institutions that protect minors to develop promotional campaigns to foster online safety for minors on the Internet’. But this collaboration is not presented in the website.

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

In the self-declaration Tuenti states that *“is a network platform for users aged 14 and over and complies with this standard by upholding a very clear-cut Privacy Policy”*. This Privacy Policy is fully explained in the Conditions and Terms of Use, using a not very easy to understand language.

“In addition, we have signed an agreement with the Spanish Data Protection Agency, whereby our public commitment to prevent minors from creating and maintaining accounts in our network is formally laid out.”

During registration process the system does not allow to select a birth date before 1995 (under 14). But users could chose any other data if they want a personal profile. In fact, as registration as a 11 years old girl was not possible, a new attempt was successfully made under a 15 years old fake profile during the same session an through the same computer. Under principle 1, the SNS states that *“members do not allow unknown people or fake profiles in their networks and report questionable profiles to our staff as a safety precaution”*, what is not a SNS proactive measure towards security rather a presumption that users will do that thing.

Despite the *by invitation only* system, it is easy to find, through Google search, i.e., someone who gives away some invitations. Introducing *“invitation for Tuenti”* on Google more than 66,000 results are obtained. There are pages as www.tuentiadicton.es, www.invitacionestuenti.net or www.eltuenti.org where users can obtain an invitation from unknown members.

Again, most of relevant items for this principle are only available at the Conditions and Terms of Use.

Principle 3: Empower users through tools and technology.

As it is stated on its self-declaration, *“Tuenti provides its users with user-friendly tools that ensure a high level of privacy. We offer our users a wide range of very secure functionalities that, for instance, allow them to block messages sent by unknown senders and to decide which of their contacts can or cannot view and/or download their pictures”*. Most of the functionalities offered to users are not mentioned on this document (self declaration) but are exhaustively detailed on the Conditions and Terms of Use.

No reference to parents or educators is made in this point, and the self-regulation model is presented as the best security system.

Inside the SNS, the availability of tools to report abuse or bullying is not clear: those are under the Frequently Asked Questions, covering all kind of subjects (from how to use tools, to more serious issues).

Users are provided with tools to control their own information: they can block users, remove postings or pictures.

Profiles are opened under real names, nor nicknames, including as mandatory fields, information as name of school (selected from a list, fake names are not possible), university (the same applies) or company where user is working (it is the only option not using an existing list).

Besides that, school/university options are linked, as mandatory information, to expected graduation year. The school or university name is presented with the place where the educational center is located. Users can change the privacy options of their profiles (open to

everyone, only friends or friends of friends), but basic mandatory information (name, school or university, and city) is public and searchable. It is possible, i.e., to find where a particular person lives (city), or which school is attending.

Under principle 1, in self-declaration, Tuenti recognises that it “*does not index any user data in online search engines, and nobody can join Tuenti without a prior invitation from a current member*”.

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

Self declaration relies on users as the main factor to report conduct or content that violates the terms of service. Self declaration does not identify a proactive attitude towards these issues. It also recognizes that it is improving the Conditions and Terms of Use in order to create a safer environment.

Although it is easy to report an abusive picture/video, there is no quick way to report an abusive situation: user is redirected to the FAQs, or, if he has read the Terms of Use, he knows he can write an email to the SNS, and an email address is provided.

In the FAQs it is not a direct tool to chat with some responsible of the network. It is possible to send a message through the help page inside the SNS, but limited options are offered: it just could be tagged as an “error” or a “suggestion”.

A message was sent to soporte@tuenti.com, the email provided by the SNS, asking for help to deal with an uncomfortable situation (receiving scary messages from other user). An automatically generated email was received from SNS with the advice of checking again the FAQs looking for an answer and, in case it was not found, sending a new message.

Later, other email, with a more personalized answer, was received where some extra information was provided explaining how to report a user or an illegal content. In both cases, a technical procedure was explained, and it was remarked that in order to evaluate the reporting, appropriate problem classification was needed.

Principle 5: Respond to notifications of Illegal content or conduct.

Inside the network, and coherently with self declaration, users are provided with quick and efficient tools to block content or users with inappropriate behavior. Users could report an illegal or abusive picture, video with really simple tools.

It is also mentioned that the SNS offers its Support team with ongoing training on legal and privacy issues to answer quickly to users demands, reports and questions.

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

It is interesting that in this principle, where Tuenti is doing its best, is not well described in the self-declaration: it is just mentioned, the by invitation only system, but not explained.

Users are allowed to invite friends to join the network. Those friends only could open an account under the email provided by *current members*: when opening a new account, email information is system provided as non-removable field.

Besides that, some personal information is included in the profile: name and last name, sex, birth date, province, school or university attended and expected graduation year. Filling in these fields is mandatory, and all of them are automatically uploaded to the profile.

And again, Tuenti assures that profiles are not indexed on search engines.

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

In its self-declaration Tuenti does not mention anything about that. It says it works with several institutions, mentioned in the self-declaration, in this field. But it is not explained how collaboration works, and no links to this institutions are provided at the homepage, nor inside the network.

Again, most of relevant information is provided in the Conditions and Terms of Use.

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				Not Tested	
6		X			
7				Not Tested	

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