

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

ZAP.LU

André Melzer, Université du Luxembourg

Introduction

ZAP is a free-access social networking website (“*community platform*”) in Luxembourg for people aged 13 and above. Due to the three main languages that are spoken in the country, ZAP offers a Luxembourgish, German, and French version of the site. It provides information on event schedules, nightlife reports, user profiles, homepages, and photos. ZAP users may present and describe themselves for social purposes using public messages, friend lists, a mailing system, and picture and video upload functions.

The implementation of the Safer Social Networking Principles was tested on October 26th, 27th, and 30th 2009. Tests were conducted using the Luxembourgish version of ZAP. Testing revealed that ZAP implemented Principles either partially or fully. Some aspects that were announced in the self-declaration as being in preparation are still awaiting implementation (e.g., guidelines for parents and carers). Other important aspects of the self-declaration were found not to work properly (e.g., age-control system, feedback to reported harassment).

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

The self-declaration contains several details on measures that the SNS provider is taking in order to comply with Principle 1 on raising awareness of safety education messages. The self-declaration contains information on Terms of use, but not on privacy. With regard to safety information the SNS provider claims “*ZAP is actually working out a guide for school personnel and parents*”. Collaborations of the SNS provider and several youth services (“*Service national de la jeunesse*”), as well as Internet safety organizations (“*LISA Stop Line*”), are also mentioned.

The SNS website itself provides a mixed picture, though. Information like Terms of use, safety policy and privacy policy is easily accessible. Surprisingly, and unlike safety policy and privacy policy, Terms of use is available in German and French only, but not in Luxembourgish. The website provides users with a link to the *National Commission for Data protection*. In addition, there is explicit information on both content and conduct that is not allowed on the social network. Likewise, the consequences of engaging in prohibited behaviour and/or actions are clearly stated. Neither the aforementioned guide for teachers (see also Principle 3) nor any web link to the organizations that were mentioned in the self-declaration form may be found on the website. General information for parents is not available separately, but included in the guidelines for teenagers. Also, there is no information on specific risks while using the social network. This is also true for the PDF files containing

safety-relevant tips that were mentioned in the self-declaration. However, these tips are available as online information.

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

In the self-declaration the SNS provider states that only people aged 13 and older may fully access the social networking community. It is also mentioned that age-appropriateness of advertising will be ensured through the use of cookies. However, the self-declaration does not provide information on what kind of information on the website is age-inappropriate, how under-age users are prevented from accessing the SNS, or if parental controls are promoted. In addition, although the self-declaration outlines that exposure to potentially inappropriate content will be limited through the use of buzz word filters, there is no indication of how inappropriate contact may be prevented.

When signing up as an adult on the SNS website, ticking a box that indicated accepting the Terms of use is required. Entering the birth data of an 11-year old child leads to a rejection of the user during registration. However, simply changing the year of birth from 1998 to 1994 leads to successful signing up. The age control system appears to be largely ineffective, because it may easily be outmanoeuvred even without having to delete cookies or using a different e-mail address. Younger children are thus not prevented from having access to large parts of ZAP. Hence, they may become exposed to information that is either inappropriate, or that parents may find offensive. In addition, parental control tools are missing on the SNS.

Principle 3: Empower users through tools and technology

With regard to empowering users, the self-declaration lists numerous ways how the SNS provider supports this. Users may put unwanted other users to an “Ignore List” and manage their own profile and homepage by restricting access to certain sections. They may also delete unwanted comments, prevent posting of public messages on their profile, and report unsuitable behaviour. There are no comments on how users may report unwanted contact or how profiles may be deleted. There is also no information on how parents may be educated about available tools on the website that help them to protect young people (see also Principle 1). With regard to age restriction, profiles and homepages of registered users under the age of 16 are not searchable on ZAP. This is also true for browsing user pages, which is not possible for users aged 13 to 16.

During testing, it was observed that the ZAP website offers many tools that empower users. This includes specifying user groups that may or may not contact the user (i.e., blocking function), as well as specifying actions with regard to individual profile availability or accessibility. When signing in to the test user profile, Zap’s “greeting message”, which is displayed in the user profile (but not send as a separate email) includes information on safety tips and/or guidance about publishing personal information or photos to the profile. However, it was observed that default settings render personal information visible to all other users, such that restricting the visibility depended on the account owner’s activity. In contrast, deleting a profile is supported by a dedicated web link together with easy-to-understand “how-to” information. No information was found what personal information the SNS provider will store once the profile is deleted.

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

In the self-declaration form, the SNS provider indicates that there is a “Report” button on the top of every page. However, there is no information on age-appropriateness or understandability of the reporting procedure. In addition, there is no indication how to make an effective report, how reports are typically handled, or that reports are acted upon expeditiously.

Testing revealed that the “Report” button is not located on the top of every ZAP page, but only on the top of non static pages like, for example, personal pages. The “Report”

mechanism is difficult to understand for children and young people, but may be found easily and quickly. Most importantly, however, asking for help with the standard message “*Someone is sending me scary messages (...)*” remained without consequences; there was no notification/receipt that the report was sent to the SNS provider, and no information on how the report will be dealt with. Therefore, a second report with the same help-seeking message was sent two days later. Again, there was no feedback from the provider.

Principle 5: Respond to notifications of illegal content or conduct

The self-declaration of the SNS provider indicates that illegal contents and conducts will always be reported to the law enforcement. The reader is also informed about consequences of rule infractions (i.e., warnings or exclusion of the profile from the ZAP website). Yet, the self-declaration does not indicate which particular processes will take place when the provider is informed about alleged illegal content or conduct.

When using the SNS after signing in to an individual user profile, clear information is given on where to report other users or bothering content. This is also true for blocking functions (e.g., blocking a friend or a contact request) and the so-called “*Report*” button (see also Principle 4).

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

According to the self-declaration the SNS provider clearly states that users will be provided with a range of privacy setting options. In particular, users can manage themselves how many details they want to publish about their own person. In addition, they are also encouraged not to reveal any private information. On the other hand, the self-declaration does not contain any practical information like, for example, that privacy options are accessible at any time, or that users are able to view their privacy status or settings at any time.

When signed in to the test user profile (as a 15-year old user), changing privacy settings is easy and always possible. Also, third-party applications will be installed only after previous permission of the test user. For the initial step of the first-time registration process, entering E-mail address and individual password is sufficient. Next, a so-called “*profile configuration*” window appears. Mandatory personal information comprises first and last name, date of birth, as well as the user’s hometown and land/region, but not home address or nationality. Other information is either optional (e.g., gender, nickname, picture of the user), or not mentioned at all (e.g., school/workplace, phone number, personal security number, religious orientation). The initial profile configuration also includes checkboxes on adult-relevant information like, for example, user’s sexual orientation, marital status, name of the partner, and main interests of using the SNS. Providing this information is surprising, because the self-declaration indicated that users are encouraged not to reveal any private information. Following registration, real name or nickname is automatically inserted into the user profile, depending on the user’s previous decision, together with information on age, gender, and user’s hometown. E-mail is not visible, though. Sexual orientation, marital status and main interests are also displayed on the profile page. A look at privacy settings reveals that by default all information is visible to “everyone” unless the user restricts visibility. Again, this is in contrast to Principle 6 that only the name and the age will be shown per default. After signing in as an adult user, searching for profiles of users aged 16 is possible, but not for the 15-year old user. Also, no search results are rendered for profiles of users who are 12 years old or younger. These observations are in line with the self-declaration of the SNS provider.

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

In the self-declaration form the SNS provider indicates that it employs some form of moderation, namely a daily check of all uploads performed by the SNS administrators. A content that does not correspond to the Terms of use will be immediately removed. In

addition, buzzword filters (see Principle 2) serve as technical tools to control for potentially illegal or prohibited content. With regard to real-time contact with children/younger user the SNS provider indicates in the self-declaration that they count the frequency with which adults contact minors. Great age differences between corresponding users as well as suspicious behaviour are supposed to lead to investigations of the profiles in question. There is no indication through which kind of technology or service this will be achieved. Finally, there is no indication in the self-declaration whether or not ZAP uses human moderators, or if attempts will be made to avoid real-time contacts between children or young people and candidates, who are unsuited for this kind of work. As was already mentioned with Principle 5, there is no indication in the self-declaration that the SNS provider responds to user-generated reports. Also, there is no indication whether ZAP includes a “community alert function”.

Summary of results and Conclusion

Testing revealed that there was full compliance between three Principles (i.e., 1, 3, and 6) and the self-declaration from the SNS provider of ZAP. In contrast, only partial compliance was observed with Principles 2, 4, 5, and 7. With regard to ensuring that services are age-appropriate (Principle 2), the self-declaration lacks information on parental controls and preventing under-age users from accessing the SNS. In addition, the self-declaration does not contain information on how to make an effective report of inappropriate conduct or content, and how reports are typically handled (Principle 4). There is also no information on how the provider will respond to notifications of illegal content or conduct (Principle 5), and how reviewing illegal or prohibited content/conduct will be done (Principle 7).

Testing also showed that, except for Principle 3, not all aspects of the self-declaration have been fully implemented on the SNS website yet (Principles 1, 2, 4, and 6). For example, the currently built-in functions in ZAP appear to be insufficient to prevent minors (i.e., children younger than 13) from accessing information on SNS websites (Principle 2). Testing also revealed that even without having to delete cookies simply changing the year of birth was sufficient to outmanoeuvre the registration barrier. In addition, the SNS website is currently lacking information for children and carers, as well as links to educational material. Finally, it is important to note that there was no feedback at all following two reports on harassment sent to the SNS provider, casting serious doubts on the belief that such reports will be treated timely and adequately by the provider of ZAP (Principle 4).

In sum, testing leads to the impression that the ZAP website is currently predominantly focusing on adult, or at least “older”, users, which are given many options. With regard to minors, but also parents and teachers, however, testing revealed that several shortcomings need to be addressed to make the ZAP website fully compliant with the Safer Social Networking 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			
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			Insufficient age control system
3	X				
4		X			No feedback to reported harassment
5	<i>Not Tested</i>				
6		X			
7	<i>Not Tested</i>				

The copyright of this report belongs to the European Commission. Opinions expressed in the report are those of the authors and do not necessarily reflect the views of the EC.