

BEBO

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Introduction

Bebo is an online community where members can find and communicate with others as well as browse and share user-generated content. Users interact with friends' profiles, send messages to other users, join groups, become fans of bands, use third party applications and games, and upload and share photos and videos. Users must be 13 or older to use Bebo. Users can add their [AOL Instant Messenger](#) (AIM), [Skype](#) and [Windows Live Messenger](#) user names to their Bebo profile.

Bebo was founded in 2005, it operates globally and many different languages but is most popular in Ireland, the United Kingdom and New Zealand. AOL acquired the site from its founders in 2008 and they subsequently sold it to Criterion Capital Partners in 2010. Figures from marketing firm comScore show the monthly users in February 2010 were 3.8 million.

The following is a report of findings of the analysis of the self-declaration provided by Bebo and the testing of its website. The test was conducted in December, 2010 – January, 2011.

Summary of main findings

The self-declaration provided by Bebo is in-line with the Safer Social Networking Principles and the implementation of its self-declaration in Bebo website is quite satisfactory.

Bebo provides safety information for parents, teachers and young users. Most of the information is developed by third-party organisations and either hosted on or linked to from the Bebo website. The general safety information is easy-to-find and easy-to-understand. The footer containing links to Safety, Privacy and Terms of Service is available on all pages within the site.

Users are required to provide basic information about themselves during registration. Profiles of minors are set to private by default. Once registered there are optional fields for them to enter more personal information including details of the user's home address, relationship status, and mobile phone number. Users are able to access and alter their privacy settings at any time. Some context sensitive advice is given in to help minors make appropriate decisions about sharing their personal information.

Bebo has implemented several measures on its website to avoid that minors are confronted with inappropriate content. However, it appears that the advertisements displayed are not always selected based on the profile of the user. For instance, one of the advertisements displayed was for a dating site that requires users to be at least 18 years old to join.

Bebo provides mechanisms for reporting inappropriate content, contact or behaviour on users' profiles and beside photo and video modules on the site. However, as the testing shows, even though the reporting mechanism is user-friendly it proved to be quite ineffective. Indeed, even though the "victim of bullying" did receive an acknowledgement that her report had been

received, no further actions were taken by the provider and, thus, the “bullying” pictures and messages created for this test remained on the site and the bully did not get any warnings.

Analysis of Results by Principle

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

Main findings in relation to the self-declaration

According to its self-declaration Bebo provides clear guidance for children and young people on how to navigate their website safely. Safety pages include animations and relevant information on various relevant safety-related topics including bullying, privacy, etc.

Bebo states that they provide information about Terms of service, (un)acceptable conduct and the consequences thereof in a prominent, accessible and age-appropriate way. This information is specially targeted at children, parents and teachers.

Although the self-declaration indicates that Bebo offers targeted educational materials and tips for parents (e.g. Know it All for Parents and ConnectSafely), it is not explicitly mentioned if Bebo provides parents with technical any controls (e.g. parental filters) to support a safer and responsible safer internet use by children.

Main findings in relation to the website

Confirming the analysis of the self-declaration, Bebo provides targeted safety information for parents, teachers and young users. The general safety information is easy-to-find and easy-to-understand. The safety information is linked to directly from the footer of the homepage. The footer containing links to Safety, Privacy, and Terms of Service is available on all pages within the site. There are step-by-step 'how to' instructions in the Help section of the site detailing how to configure all aspects of the Bebo site including how to configure user profile settings to facilitate a safer experience on the site. The site also provides graphic and audio animations with Bebo-specific advice and general internet safety awareness raising videos that have been developed by third-party online child protection initiatives.

The code of conduct for young users is not explicitly stated but rather contained in the animated instructional pieces on the Safety page. The content for teachers has been developed by third-party organizations and hosted in the Bebo Safety section. The parenting information is linked to from the Bebo Safety section and hosted on the local internet safety awareness site.

The Terms of Service (TOS) are linked to from the footer of all pages. It is a long document (4400 words). Although efforts have been made to use plain language, it is still a quasi-legal text with technical terminology throughout. The TOS explicitly defines the types of content that if upload could result in the user's account being terminated.

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

Main findings in relation to the self-declaration

As specified in their self-declaration, the minimum age registration requirement in order to subscribe to Bebo is 13. The measures taken by the provider in order to identify and delete under-age users include textual searches to identify under age users, asking for birth dates

during registration and employing cookies. Upon discovery that a user is younger than 13, Bebo deletes their account.

Bebo refers to diverse human and automated mechanisms through which the service provider ensures limited exposure to potentially inappropriate content and contact for children, for instance, by providing a Report Abuse button, by ensuring that age-restricted content is not viewable by children of certain ages, by scanning all hosted images for potential pornography; etc. As stated in the self-declaration, inappropriate URLs are blocked from the site. Bebo also claims that professionally produced content follows applicable laws and regulations to “ensure that content is age-appropriate” so that, for instance, moderate sexual or violent content should be provided with guidelines and strong sexual or violent content should be “age-restricted” (i.e. not viewable by users below a certain age).

The self-declaration does not provide information on the ways in which this service provider promotes the uptake of parental controls to allow parents to manage their children’s use of the service.

Main findings in relation to the website

As stated in the self-declaration, Bebo relies on self declaration of age by the user in the registration process as the key mechanism for ensuring that only children over 13 can become members of their website. When trying to register as a 9 year-old permission was denied and a cookie was placed on the machine preventing re-registering as older from that machine until the cookie was removed. Bebo does not have any parental control mechanisms.

Confirming the analysis of the self-declaration, when logged in as a minor in Bebo no strong sexual or violent content was displayed. In the case of commercial content, most of the content-displayed is age-appropriate. Banner and right-column advertisements were displayed on minors` homepage. When visiting other pages on the site a third advertising space on the left-column was used. These advertisements changed every time the page was refreshed; usually these adverts were for mobile phone companies and internet service providers. However, Google Ads, advertisements for online games and advertisements for adult dating sites also displayed on occasions. It appears that the advertisements displayed are not selected based on the profile of the user. One of the advertisements displayed was for a dating site that requires users to be at least 18 years old to join.

Principle 3: Empower users through tools and technology

Main findings in relation to the self-declaration

In its self-declaration Bebo refers to a wide range of tools and technologies employed by the service provider to assist children and young people in managing their safe experience on the service. These include: all profiles are private by default. “Setting up a profile to private means that only ‘friends’ may view the profile or contact the user”; it is not possible to search for under 16 users via search engines; it is possible to block other users and reject friend’s requests; users are able to pre-moderate/review comments before they appear on their profile; users can restrict age range of people able to contact them, etc.

Supporting information about these tools is available to users, teachers and parents from all pages.

Main findings in relation to the website

Bebo have taken measures that can help minimise the risk of unwanted or inappropriate contact between children and young people and adults. As stated in the self-declaration, Profiles of under 16 year olds were not found by searching for them in search engines. Adults registered on the site can only find young users if they know their email address or profile URL, even then the young user must approve their friendship request before they can see their profile.

Confirming what is stated in the self-declaration, minors' profiles are categorized as 'Private' by default on registration, this means that only users that are accepted as friends are able to access the profile or contact them. "Friends of friends" can see Minor1's name, thumbnail photo, hometown, gender, and interests. But if they try to open the minor's profile the following message is displayed: "*You must be friends with this person to view their profile. Looks like you're not friends with this person yet and their profile is set to private. To see their full profile, invite them to be your friend on Bebo.*" Friends of friends can send friend requests, but not personal messages.

Even though minors can configure their account settings to allow everyone to see their profile, there is context sensitive help in the privacy settings section strongly recommending that under 21s should not do this. Age, online status, and how long you have been a member of the site are displayed by default but can be hidden. There are options to make your profile searchable in search engines and to accept game challenges from strangers in Apps. It is possible to block other users and report abuse by clicking buttons on the profile, comment, or photo that offends.

By default, friends can post comments and whiteboards on minor's profiles. They can opt to allow users to post directly to their profile or they can moderate posts by non-friends only by selecting the appropriate radio button in their profile privacy settings.

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

Main findings in relation to the self-declaration

As stated in its self-declaration, Bebo provides diverse, prominent and convenient mechanisms to report inappropriate content, contact or behaviour that violates their Terms of Service. They provide users with a Report Abuse system that includes, among other functionalities, the presence of Report Abuse links on each profile page, photo album, group and posted application. These links provide different options (remove someone from friends, block user, report abuse or filing a police report).

Bebo claims that they provide clear information and support so that users can make informed decisions regarding when and how to use each reporting option (e.g. by informing users about what information to supply with their report and also telling them how their report will be handled). According to the self-declaration, the reported information is sent to Bebo's abuse management team. They assess the report and if users are "found to be in breach of the Terms they are either issued a conduct warning or have their accounts blocked depending on the severity of the breach."

The self-declaration does not explicitly mention if the reports are acted upon *expeditiously*.

Main findings in relation to the website

Confirming the analysis of the self-declaration, once logged into Bebo, the report abuse link is prominently displayed on most content modules in the site. During the test a (fake) situation was created where one minor bullied another one by means of nasty pictures and comments. To report the bully, it was necessary to go to the bully's profile page and click on the Report Abuse link under her profile picture. The category of abuse was chosen from a drop-down list. The reporting minor provided details of the harassment in the Reason for Reporting this Member field. She was asked to copy and paste an example of her harassment. This involves navigating away from a half-completed form and losing the text that had already been inputted. Further, it was required to agree to all future reports being ignored in the case where invalid reports were made. This was done by checking a box on the form. This condition could act as a deterrent to reporting in particular because users are not told what constitutes an invalid report.

As opposed to the analysis of the self-declaration, Bebo did send an "acknowledgement" e-mail to the "victim" but only three hours after having sent the report. An email from Bebo Abuse was received saying that the report had been investigated and that any measures "deemed necessary" had been taken. However, no specific information on the actions taken was given and no report reference was quoted in the email. The offensive content that was reported to Bebo was not removed from the profile and no warnings were received by the user that posted the content. Thus, even though the reporting mechanism is user-friendly it proved to be quite ineffective.

Principle 5: Respond to notifications of illegal content or conduct

Main findings in relation to the self-declaration

According to its self-declaration, Bebo “has arrangements in place to share reports of potentially illegal content or conduct with relevant law enforcement agencies”. Bebo claims that these reports are dealt with as “high priority”. Bebo also supports the education of investigators about “how to lawfully obtain data from Bebo” (e.g. the UK Home Office’s Single Point of Contact training programme).

As previously mentioned (Principles 2 and 4), Bebo specifies in its self-declaration the mechanisms employed to identify, review and eventually remove offending content via both automated (e.g. scanning software) and human-based mechanisms.

Because of ethical reasons, Principle 5 was not tested in the website.

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

Main findings in relation to the self-declaration

As stipulated in its self-declaration users in Bebo can manage their personal information and privacy through a wide range of privacy options including, among others, the possibility to choose if one’s profile is viewable by "Everyone" (public) or to "My friends only" (private); whether one’s age is visible on their profile or not (by default not visible if date of birth is under 16) as well as being able to decide the minimum and maximum age of members who can contact them; etc.

According to the self-declaration, users are able to access and alter their privacy settings at any time – either via a link situated in a prominent place at the top of every page on Bebo, or via the ‘edit profile’ link underneath their photograph on their profile page. Details provided during registration are not directly mapped onto the user’s profile, for instance the name provided during registration is not the user’s full name.

Main findings in relation to the website

All the privacy settings are located in the one place (Privacy Settings). These setting can be accessed at any time by clicking the Setting link on the header on all pages. They can be changed by selecting radio buttons and check boxes and saving the settings. There are only 12 options on the page, all are described in simple English. As stated in the self-declaration, users can toggle their profile between public and private. Users can also specify an age range for non-friend members that can see their profile. They can decide to hide some of their personal information such as age and profile views and to allow their profile to be found in search results. There is context sensitive advice recommending the friends only setting to minors. It is possible for users of any age to alter their privacy settings at any time. Also, even with their profile categorized as ‘Public’ it is also possible for Bebo users to block other users and configure their account to allow only ‘friends’ to post comments on their profile and can delete unwanted comments before they are published on their profile.

The testing showed that it is possible for Bebo users to cancel their membership. Details on how to do it are contained on the 'Settings' link on the navigation bar on any page. The procedure is straightforward. You simply have to click the 'cancel your membership' link located at the bottom of the 'Settings' page. You then click the YES button to actually cancel

your membership. During the membership cancellation process, the tester was prompted "Cancelling your account will remove your details from Bebo. You will receive no further emails from us. This process can NOT be reversed." This seems to indicate that personal information is deleted (and not just deactivated) although it is not clearly stated.

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

Main findings in relation to the self-declaration

In its self- declaration, Bebo states that they have established both “proactive and reactive means to identify potential Terms of Service violations” including “prominent and convenient ‘Report abuse’ mechanisms” and searching for inappropriate content (e.g. by scanning the Bebo site for potentially illegal content). The potential violations identified, including illegalities, are analysed and processed (See Principles 4 and 5).

Principle 7 was not tested in the website.

Summary of Results and Conclusions

Bebo has implemented Principles 1, 2, 3 and 6 very satisfactorily and Principle 4 rather satisfactorily. Some areas of attention include:

- Even though the reporting mechanism is user-friendly and users are sent an acknowledgement that their reports have been received, still the reporting mechanism proved to be quite ineffective.
- There is no way for non-members of the site to access the report abuse function.
- The advertisements displayed are not always selected based on the profile of the user.
- Simplifying The Terms of Service (TOS) so that they are easy-to-understand for younger audiences.

Assessment of all the Principles in the Self-declaration

<i>Principle</i>	<i>Very satisfactory</i>	<i>Rather Satisfactory</i>	<i>Unsatisfactory</i>
1	x		
2	x		
3	x		
4	x		
5	x		
6	x		
7	x		

Implementation of the Self-declaration on the SNS

<i>Principle</i>	<i>Very satisfactory</i>	<i>Rather satisfactory</i>	<i>Unsatisfactory</i>
1	x		
2	x		
3	x		
4		x	
6	x		

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