

# GIOVANI

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## **Introduction**

Giovani is an Italian SNS held by the Internet Company Banzai. The company has incorporated Studenti Media Group, an internet group born in 2007 which runs other community services targeted to young people such as Studenti.it, and Girlpower.it. Giovani has 2.807.222 registered users, as stated in the top left box on the homepage. The community is age restricted to those younger than 13 years old. The SNS offers users the possibility to create their own profiles, a personal blog, and a photo and/or video gallery. A further feature recently added to the service is the possibility to upload their photo albums on a photo sharing site managed by AltaVista (part of Banzai). Users can also join groups, and participate in discussions in the forum. The forum contains the following threads: Sex; love; news and politics; literature; music; TV and cinema; mobile phones; videogames; computer and the internet; sport; editorial staff forum; helpline; XXX (erotic content X-rated).

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

## **Summary of main findings**

In general terms, Giovani has poorly implemented the Safer Social Networking Principles. On the website, Giovani has implemented a number of safety measures, though not always successfully. For instance, even though the minimum age requirement is 13, the test demonstrated that 12 year olds could register on this SNS without even having to fake being older to comply with the 13+ rule to become members of the site.

Two important weaknesses of the SNS concern the fact that reports on inappropriate content or conduct are inefficiently handled and that profiles of minors are not set to “private by default”. As the test revealed, reports from users are not acknowledged and users get no answer to their reports. Besides, even though inappropriate messages to the user are deleted, other types of content, also reported as inappropriate, are not.

Even though the profiles of minors are not set to private by default, users still have the possibility to set their profile as semi-private (accessible only to registered users or only to friends) or fully private (visible only by the user).

In relation to the safety information available on the site, the Help section provides relevant safety information and concrete tips specifically addressed to children to help them use the SNS safely. It also clearly explains the Terms of Use of the service. Safety information/tips for parents, teachers and carers are also available in the Help section.

## **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*

In its self-declaration *Giovani* states that they provide a FAQ and a Helpline that are visible, prominent and linked on the whole social network. The helpline contains “2 sections with behaviour advices and explanations,” one section is targeted at users and the other one to parents and teachers. Since the end of June 2010 *Giovani* counts with a new Helpline and a new Terms and Conditions section written in a clear and age-appropriate language. The new Helpline can be reached through direct links within each page in the *Giovani.it* site.

The self-declaration does not clearly specify what type of safety content is provided by *Giovani*, except from the rather vague “behaviour advices and explanations”. The consequences of inappropriate behaviour are not mentioned in the self-declaration.

#### *Main findings in relation to the website*

*Giovani* has implemented a Help section (linked in the footer, and in each page of the profile) which contains information and tips for both children and parents/teachers/carers. In particular, the ‘under 18’s’ page is targeted to children and contains relevant safety information and tips on inappropriate content and behaviour that violates the terms of use, and the consequences of engaging in prohibited behaviour; information on how to report an abuse; information on how to modify the privacy settings and on how to safely use the SNS. Specific risks mentioned include: pornography, sexting, grooming, violent or hate content, divulging personal information, spam, viruses and other commercial risks. The language used is plain, and although the information is only textual, it is articulated in short pieces of text that make reading easier. Bold characters facilitate skimming and help identify relevant information. Parents, teachers and carers are provided with information on safer internet use and with links to organizations and authorities active in promoting children’s online safety.

The Terms of Use and Privacy Information are also accessible from the footer in the homepage link to the *Studenti Media Group* policies. They are written in a technical jargon and are, thus, difficult to understand for children.

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

#### *Main findings in relation to the self-declaration*

The self-declaration mentions that *Giovani* is targeted to young people aged 14-25, but it is not explicitly mentioned what the minimum age requirement is. According to its self-declaration to sign up to *Giovani* users need to provide their date of birth.

*Giovani* claims that underage users are placed in a “special user group” whose public behaviour, connections and profiles are daily controlled. However, the self-declaration does not specify how this is actually done. Further, no other (technical or legal) mechanisms to ensure the limited exposure of minors to potentially inappropriate content and contact are mentioned. No information is provided on the types of services that are considered as not

appropriate for children and young people, either.

It is not clear from the self- declaration if or how underage users are prevented from registering on the website or what measures are taken by the provider in order to identify and delete under-age users from their services. Besides, no information is provided regarding the ways in which Giovani 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 opposed to the self-declaration, the Terms of Use in the Help section clearly indicate that only children aged 13 or older can become users of the SNS. Compliance with age restrictions is promoted in the registration process, where the date of birth field is pre-fixed and contains 1998 as the youngest option. Interestingly, at the time of testing (December 2010) all children born in 1998<sup>1</sup> were still 12 years old and, thus, below the minimum age requirement, however, they were still able to become members of Giovani without even having to fake being older to comply with the 13+ rule to become members of the site.

When signing up to Giovani a disclaimer advice appears, and children have to guarantee they are assisted by parents in order to complete their registration (which is completed only after clicking on the verification link sent via email). The main limit of an age verifications system as the one described is that younger users can pretend being older and being assisted by their parents. The tester's attempt to register as a nine years old failed because she could only pick 1998 as the youngest date of birth. However, neither additional information to prove the child's true age was required nor any confirmation by parents (e.g. to send a fax or email to the SNS). Eventually, it was possible to register as a 12 year-old by simply picking 1998 (or any other one listed) as the year of birth.

As stated in the self-declaration, Giovani does not provide any parental control mechanisms, but the Help section targeted to parents and educators suggests the use of parental control software. However, it provides no links to external educational resources or websites where the software might be available.

#### ***Principle 3: Empower users through tools and technology***

##### *Main findings in relation to the self-declaration*

According to its self-declaration Giovani permanently develops new tools which are quickly communicated to the users, but it neither specifies what these developments are nor in which way they serve to empower younger users. In its latest updated self-declaration Giovani committed itself to implement the following features by December 2010: 1) option to disable the online presence within the user profile page; 2) option to set as private the personal profile of the user and 3) option to set as private the personal blog of the user.

Nothing is mentioned in the self-declaration on the steps taken by the service provider to ensure that private profiles of users registered as under 18 are not searchable. Even though from December, 2010 users should have the option to set their personal profile as private, it is

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<sup>1</sup> Since February 2011 the youngest option has been modified to 1997. However this report refers to the findings from the period December 2010 - January 2011.

not mentioned if this will be the “default setting” for minors registered on the site.

*Main findings in relation to the website*

The testing of the site demonstrated that profiles of minors are not set to private by default, and so are by default visible to all users of the SNS. Profiles of minors can even be searched in the SNS search engine by users who are not registered to the community. Non registered users can also visit the minor’s profile and access the personal information displayed there. However, these profiles are not searchable via external search engines such as Google. Minors can be searched and contacted by adults with no restrictions. Adults can also send friendship requests and add minors to their contact list without being warned about contacting a child. Minors are able to reject friendship requests, and block other users from contacting them and viewing their profile by adding them to the ‘enemies’ list. No option to pre-moderate content or comments on the wall is given. The default option is that all registered users can comment on one’s profile, but minors can restrict comments on the wall only to their friends, or to nobody.

In the part of the Help section explicitly addressed to them, parents are provided with suggestions on how to help their children navigate safely. These include mainly social mediation strategies, such as telling their children to not give away personal information (such as address, phone number, school); sitting with them while their creating their profiles and checking the hard disk data and using filters to restrict access to X- rated websites.

#### *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*

According to its self-declaration *Giovani* offers a “Report an Abuse” hyperlink on every relevant page and on those places where users may have access to content provided by other users or where interaction with other users is allowed. Apart from these links, the helpdesk can be contacted. They provide answers daily and check out inappropriate content. There is also a Helpline easily accessible on every page.

No information is provided in the self-declaration on if the reporting procedures are age-appropriate or easily understandable for children and young people. Besides, it is neither mentioned if reports are at all acknowledged nor if they are expeditiously handled.

##### *Main findings in relation to the website*

Users can report any inappropriate content, contact or conduct using the ‘report abuse’ form, accessible from the Help section, on a user profile, when reading a message and when viewing other users’ galleries. As part of this study, a (fake) minor user reported that she had been bullied on this SNS. A realistic bullying situation was set up between the (fictitious) owners of profiles that were created for this assessment. The scenario consisted of one minor being bullied by two other minor users who posted a nasty comment on the wall of the “victim” and who uploaded and sent hurtful pictures. As the “victim” could not cope with the nasty comment put on her profile and the embarrassing pictures, she contacted the provider. The tester was able to report an offensive private message by clicking on the ‘Block user and report abuse’ link displayed under the sender’s nickname. To report inappropriate content on the wall, the tester had to click on the nickname of the person posting the offensive message, and then click the report abuse button under the picture of the abuser on her profile, which was not really easy to figure out. Finally the tester reported abuse by clicking on the report abuse button displayed under a photo in another user’s gallery. Independently from where and how the report abuse is accessed, to report any violation of the Terms of Use users have to fill in a form indicating the kind of inappropriate content or behaviour from a pre-filled list (pornographic content; inappropriate/offensive content; unauthorized personal information or photo; offensive comment; violation of copyright). A blank space for adding more details is also provided.

As indicated in the analysis of the self-declaration and demonstrated by the test, reports of misbehaviour and abuse are not acted upon expeditiously: users get no reply and the reported content (message on the wall or picture) is not deleted from the website. Private messages received by the user and reported as offensive have been deleted after more than a week from reporting. Moreover, the reporting mechanism is not user-friendly especially when it comes to deciding which reporting button one should use in each case as, for instance, when the tester needs to go to the abuser profile to report an offensive message on the tester’s wall. In the latter case, the reporting button is clearly not placed close to the relevant content to be reported. Nevertheless, the link to the Help section is always searchable from every page. In addition, contrary to what is stated in the self-declaration, reports were not answered to and inappropriate content is not always checked out. Of the three kinds of content reported as offensive (a personal message, a message on the wall and a picture in another user’s photo gallery) only the personal message was checked out and deleted.

Advice on community guidelines and appropriate use of the SNS is provided in the Help section.

#### *Principle 5: Respond to notifications of illegal content or conduct*

##### *Main findings in relation to the self-declaration*

In its self-declaration, it is only mentioned that “since years Giovani.it collaborates with the police authorities for law enforcement in investigations and prosecutions.” No further specifications are provided on what this collaboration concretely implies. Besides, no information is provided on the processes and mechanisms that Giovani has put into place to expeditiously and appropriately review and remove offending content. Nothing is mentioned on if Giovani provides relevant links on its website to local agencies or organizations (apart from the Police authorities) that could support the process of reporting illegal content or conduct (e.g. InSafe, law enforcement agencies, etc.).

Because of ethical reasons, Principle 5 was not tested on 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*

Giovani.it indicates in its self-declaration that they make users aware of the importance of protecting their own personal information. The FAQ contains an extensive chapter on how to minimize potential risks related to sharing personal information. Furthermore, Giovani has inserted specific privacy advice disclaimers in all the relevant pages where users may upload personal content.

Regarding specific privacy settings, as from the end of December 2010 Giovani claims it will have implemented implement the following features:

1. Option of disabling the online presence within the user profile page
2. Option of setting as private the personal profile of the user
3. Option of setting as private the personal blog of the user

Apart from these rather limited privacy options, no further information regarding other specific privacy settings is provided. Besides, no specific information is given regarding the properties of these privacy settings. For instance, it is not mentioned if these settings are prominent in the user experience or if they are accessible or visible at all times. Also, the service provider does not refer to the possible implications of automatically mapping information provided by users (during registration) onto their profiles and does not indicate if users are made aware when this happens.

##### *Main findings in relation to the website*

As shown in the test, users' profile are not private by default: without changing the default privacy settings, personal information provided at the time of registration is displayed on profiles of minors and included in their brief presentation that accompanies the 'search friends' results. This information includes: nickname, first name (only on the profile), age,

gender, place of residence, education (only on the brief presentation and expressed as lower secondary school, upper secondary school, university), a picture of the user, the photo gallery of the user, contacts list, online status, comments and messages posted on the wall by other users. Users are not made aware of this information being made automatically public. However, users can set their profile as private (accessible only by the user), or partially private (accessible only to friends or only to logged in users). They can also specify what kind of users are allowed to post comments on their profiles (all registered users – which is the default setting – only friends, or nobody) or on their blogs (nobody, everybody, only friends, all registered users, all registered users except 'enemies').

It is not possible to restrict only some parts of the profile (for example the photo gallery) to some specific users. Further privacy settings include the possibility to make their surname visible (it is invisible by default), to be invisible when viewing other people's profiles (visible by default), to remove the date of the latest login from the profile, or hide their online status in the online users' list (the options being: visible to everybody by default, visible only to friends, invisible). The function called 'block users' gives the possibility to filter groups of users (defined by age groups, number of friends, time spent in the SNS, amount of personal information included in the profile) allowed to contact them.

Privacy settings are easily accessible from the menu bar displayed on every page. Here the user finds all the privacy options provided by the website, articulated in 'general settings', 'comments', 'block users' and 'blocked/unwanted users'. These settings are easy to use. Moreover, as stated in the self-declaration, a disclaimer advice redirecting the user to information on how to protect one's privacy in the Help section is displayed in every page where users can upload personal information or pictures.

It is easy to delete the profile, since the 'delete' button is easily accessible from the 'options' menu. The provider clearly states that the profile will be effectively deleted after seven days.

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

##### *Main findings in relation to the self-declaration*

The self-declaration only mentions that "Giovani.it regularly improves the manual and automated tools that allow blocking and removing prohibited content/conduct." It is, therefore, not clear from the self-declaration if or how Giovani assesses the effectiveness of their services to identify potential safety threats.

Principle 7 was not tested on the website.

#### **Summary of Results and Conclusions**

Giovani has implemented Principle 1 rather satisfactorily and Principles 2, 3, 4 and 6 unsatisfactorily on its website. The testing on the website revealed several problematic areas, for instance:

- Profiles of minors are not set to private by default, and, thus, they are by visible to all users of the SNS.
- Minors' profiles can be searched for in the SNS search engine, even by users who are not registered to the community. Non registered users can also visit the minor's profile and access the personal information displayed there.
- Minors can be searched and contacted by adults with no restrictions. Adults can also

- send friendship requests and add minors to their contact list.
- Privacy settings are very limited.
  - Even though the minimum age requirement is 13, the test demonstrated that children younger than the minimum age required could sign up easily bypassing the 13+ rule to become members of the site.
  - Reports of inappropriate content or conduct are not user-friendly and are inefficiently handled. Indeed, reports from users are not acknowledged and users get no answer to their reports. Besides, even though inappropriate messages to the user are deleted, other types of content such as offensive pictures are not.

#### 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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