

IRC-GALLERIA

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Introduction

IRC-Galleria is available in Finland and in the Finnish language. IRC-Galleria has existed since December 2000. The current number of users is 451047 (14.12.2010 <http://irc-galleria.net/>). The age requirement is 12 years. Users of IRC-Galleria may create profiles, add pictures, videos and blog texts, make questionnaires for other users, post comments on other users' profiles and join site communities. By buying applications, users can for instance update their guest list, add logos or applications to their profile or add their picture or community on the front page of the site.

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

Summary of main findings

The site's minimum age requirement is 12 years. In fact, when trying to register as a 9 year-old, the site does not allow the minor to complete the registration process for being under the minimum age required by the site. However, by simply changing the birth date on the registration form to a "suitable" older one, it is possible to complete the first step of the registration process.

The provider has efficient mechanisms in place to report inappropriate content: Each individual piece of content has a reporting button next to it which the user may click. During testing inappropriate pictures and comments were reported to the administrators through the report button. The administrators removed the reported pictures in one day. Inappropriate conduct was also easy to report to online administrators who gave a swift response in half an hour. Inappropriate conduct and bullying could also be reported to the general administrator, where the response bounced back from the e-mail account at first and was answered in a week's time. The other reporting mechanisms found on the site were user-friendly, age appropriate and rather easy to find on the site, however, they were not as efficient as the reporting buttons.

When registering the site did not clearly report which information would be made public for all users. Most information posted on the profile was made public for all users when using the default settings. Profiles of minors are, thus, not set to "private by default". Users could protect their privacy by choosing not to post certain information (place of residence, birthday, date of registration, dating status). Certain information could also be made private for the user alone. The user could choose which information of their activities on the site to make public in their "Flow" (for instance joining groups, adjusting profile information etc.). After posting pictures users could move posted pictures into a private album where pictures were visible for the user alone. Users could also create new albums where pictures could be made visible for specific groups of people. Customising picture visibility could not be done in the default

album (Oletusalbumi). Blocked users could view the user's public profile even after having been blocked. The self declaration states that users can prevent name searches on their profile, but this information was not evident, and there were no clear instructions on how to do this.

IRC-Galleria provides some tips for children and young people on how to use the site safely in the code of conduct or "Rules". These rules are specific and easy to understand for minors. Users are given clear information on do's and don'ts on the site. The Terms of Use -section includes technical jargon what makes it hard to understand for minors.

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 IRC-Galleria states that they provide clear guidance for children and young people on how to navigate their website safely, for instance by means of giving users safety tips when building their profiles and using the community. The self-declaration stresses that constant safety education is provided on the site and through campaigns with relevant safety organizations.

In its self-declaration IRC-Galleria claims that they provide clear instructions and rules for the users, which are shown upon registration and which can be easily found in the site navigation. These instructions, clearly separated from the Terms & Conditions, explain in an age-appropriate and easily understandable language how the service should be used. IRC-Galleria states that clear information about what constitutes inappropriate behaviour is also provided through the "House Rules" and the "do's and don'ts" sections.

The self-declaration indicates that IRC-Galleria reports inappropriate behaviours. Images, texts or other illegal content is removed from the site and saved for eventual police investigation. The consequences of other types of inappropriate behaviour are not explicitly mentioned in the self-declaration. The self-declaration does not state if the website offers parents, carers and/or teachers targeted links, educational materials or other technical controls to support children's responsible and safer internet use.

Main findings in relation to the website

As the testing shows, The SNS gave clear instructions on how to navigate the SNS safely, what kind of behaviour was forbidden, and the consequences of forbidden conduct, although there were very few tips on how to navigate the internet safely in general. Safety tips concerning conduct on this specific site were easy to find in the "Rules" (Säännöt). Safety information in the "Rules" section was written in clear, understandable and age-appropriate language, easy for minors to understand. Safety tips were only provided in writing, and there were no other educational materials such as videos about internet safety or the safe use of the specific SNS.

The Terms of Use contained technical and administrative jargon and long sentences, and was thus difficult for minors to understand. Safety information was not very visible on the sites homepage, one had to find a small link at the top or the bottom of the page called

“Information” to find the pages concerning safety. The site provided clear information for parents or teachers on the functioning of the site. They were also given tips on wider internet safety in a special section for parents (Vanhemmille). Parents were provided with links to educational organizations concerned with child safety and their educational materials, although two of the links did not work at the time of the testing.

The main weakness of the site in relation to principle 1 is that children were not provided with extensive information of safe internet use in general, although under 18-year-olds were given 4 concrete safety instructions warning them not to post provocative pictures on the site, what to do if one is teased or harassed on the site, to ask their parents’ permission to join the site and not to meet new internet friends in the real world without company.

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

Main findings in relation to the self-declaration

According to its self-declaration, IRC-Galleria has a minimum age requirement of 12 years old. IRC-Galleria is not able to verify users’ age, though. Still, human moderators monitor user behaviour and remove identified under-age users from their service. Apart from the use of human moderators no further information is provided regarding the steps taken by the provider to prevent users from attempting to re-register with a different age if they have previously been rejected for being below 12.

Regarding the risk of exposure to inappropriate content for children and young people, the self-declaration states that users are provided with “lots of age-targeted” content, in particular, campaigns and advertising. However, no explicit mechanisms are mentioned to ensure limited exposure to potentially inappropriate content and contact.

The self-declaration does not refer to the mechanisms employed by IRC-Galleria to promote the uptake of parental controls to allow parents to manage their children’s use of the service. It also does not specify any functionalities put at the disposal of content providers, partners or users in order to label, rate or age restrict content where appropriate.

Main findings in relation to the website

The site’s minimum age requirement is 12 years. In fact, when trying to register as a 9 year-old, the site does not allow the minor to complete the registration process for being under the minimum age required by the site. However, by simply changing the birth date on the registration form to a “suitable” older one, it is possible to complete the first step of the registration process. The user gets, then, only a limited visitor status until their e-mail account is verified and a recognizable photograph of their face as profile picture is submitted. After fulfilling these two steps, the user gets full access to the site and its services. The fact that users must provide a recognizable picture of their faces may, in some cases, help restrict very young under-aged users from registering on the site, but it may not be so effective in the case of 10 or 11 year old children who may not “look” so different than a 12 year old child. Besides, this mechanism does not prevent under-aged users from posting a fake picture of someone older on the site.

According to the “Rules”, only age-appropriate contents should be posted on the site. However, the SNS does not specify what services or contents are considered as (in)appropriate for minors. When signed in as a child, some advertising was available on the

site's homepage. The main banner on the homepage advertises a blog on the SNS and its online community (More to Love). The blog has Samsung as a sponsor, and the company's logo is inserted in the banner. The main banner also had an advertisement for Hotmail. On the side banner there was a logo "Made in Finland", which is a certificate for products made in Finland, in this case IRC-Galleria being one of those products. On the homepage there is also advertisement for IRC-Gallerias own services, for instance the chargeable guest list.

As previously mentioned, IRC-Galleria has not committed itself to promote the uptake of parental controls in its self-declaration and this is also reflected on their website by the absence of information on this respect. Nevertheless, under-aged children are encouraged to consult their parents before using the service. Also parents are encouraged to help their children solve eventual dilemmas they may be confronted with on the internet by discussing (safe) internet use with their children.

Principle 3: Empower users through tools and technology

Main findings in relation to the self-declaration

In its self-declaration IRC-Galleria indicated that they offer many tools for their users to customize their user experience and privacy levels. For instance, users can choose what information to make visible in their profiles, they can restrict commenting on their profile or create "black lists" of blocked users.

The self-declaration does not state if the service provider ensures that the default full profiles of those registering under the age of 18 has been set to "private by default"¹ as defined in the Safer Social Networking Principles². Besides, the steps taken by the service provider in order to ensure that private profiles of users registered as under the age of 18 are not searchable are not clearly specified (apart from the fact that can prevent being searched via their name).

The self-declaration does not mention if or how IRC-Galleria educates parents about available safety tools/information such as filtering or parental control tools.

Main findings in relation to the website

As demonstrated by the test, specific minors' profiles were not searchable through any external search engines, but they were searchable through the site's internal search engine. Other users could find accounts only if they knew the user name, but pictures of new users were also posted in the section announcing "newcomers" on the front page (Käyttäjät -> Uudet käyttäjät). Any registered user can, for instance, search users of a certain age.

By default, all posted information in the minors' profile is made visible to other registered users. Thus, the information one chooses to post in their profile is automatically visible to any registered user who happens to find the profile with the exception of the e-mail address which can only be made public after the user's consent. There was no option to make the whole profile information visible to friends only. The only available options were to make the profile

¹ "Ensuring that setting a profile to private means that the full profile cannot be viewed or the user contacted except by 'friends' on their contact list".

² http://ec.europa.eu/information_society/activities/social_networking/docs/sn_principles.pdf

information “private” (only visible to the user themselves) or simply “public” (visible to all registered users). The real last name of a minor cannot be made public at all.

The user could restrict other users from commenting their site by putting other users on the "black list". The blacklisted person cannot post comments on the user's profile or vice versa. However, the person on the black list can still see the same information on the profile that friends and other users can see. One could also restrict commenting altogether, but then one also had to give up their own right to comment. Users could also reject friend requests. Furthermore, users or even friends could not post pictures on each other's profiles or tag each other. Users could not allow only friends to post or delete comments or pictures on the user's profile. Comments left on one's own page could not be pre-moderated before they were published.

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

In its self-declaration IRC-Galleria refers to two mechanisms available to report inappropriate content, contact or behaviour that violates the Terms of Service, namely a One-click Reporting Tool and the possibility to contact IRC-Galleria staff through a Contacting Form. IRC-Galleria claims that the report button is easily findable in the main navigation. Here, users can select the type of violation experienced (e.g. inappropriate images, copyright violation, unofficial advertising, terms of violations or harassing behaviour). Even though a one-click reporting mechanisms suggests a child-friendly approach to reporting abuse, some of the labels provided to classify the type of abuse may be difficult for children to understand as rather complex legal terms are employed (e.g. copyright violation).

The self-declaration also mentioned the cooperation with three “real-life policemen” from the Helsinki Police who “get a lot of reports in local police matters”. But it is not clear from the self-declaration what such cooperation involves or what the policemen are entitled to do on the site.

The self-declaration neither includes information on if the reports are acknowledged and acted upon expeditiously nor if users are provided with an indication of how reports are usually handled. Also, no information is found regarding how users are provided with the information they need to make an effective report.

Main findings in relation to the website

As the test reveals, the SNS provides efficient reporting mechanisms for children to report inappropriate content, contact or behaviour. The user could report inappropriate content or behaviour through sending e-mail to the general administrator, by asking online administrators for advice or by clicking report buttons placed next to each individual picture, comment and blog text. Reporting mechanisms were available only for users. They were user-friendly, age appropriate and rather easy to find on the site, however, as the test shows, not all them were equally efficient. In the testing two (fake) minors posted bullying comments on another minor's page. One “bully” also posted offensive pictures of the “victim” on their own site and informed the “victim” of the pictures via a private message and via public comments on the page of the “victim”.

Reporting abuse via e-mail is easy once the user has found the small link at the bottom of the page called "contact" (Yhteydenotto). E-mail reports of abuse go via the site to a general administrator. In the testing the bullied minor sent an e-mail report to the general administrator on December 13th 2010. An automatic message informed the user that the report was being processed and an answer would be given in three days. Apparently the answer from administrators bounced back from the minor's e-mail at first. The user was informed of this problem. The e-mail answer arrived on the 21st of December 2010. Here, the administrator advised the user to click the reporting button next to the content in question indicating that reporting abuse via e-mail is neither the most expeditious nor the most appropriate reporting mechanism available on the site.

Online administrators could also be sent a private message asking for advice on reporting problems. In the testing the bullied minor asked for help from two online administrators on December 13th 2010, one administrator provided advice in 27 minutes on how to report inappropriate pictures by clicking the report button. Another administrator did not answer. Finally, pictures, blog texts and comments can also be reported by an easy-to-use button placed next to each piece of content. This was the most prominent and readily available reporting mechanism. The bullied minor reported the bullying pictures on December 16th 2010. After reporting bullying pictures and comments through the report button, the administrators removed the pictures in one day demonstrating the effectiveness and the efficiency of the reporting button mechanism as opposed to e-mail based ones.

Principle 5: Respond to notifications of illegal content or conduct

Main findings in relation to the self-declaration

The self-declaration indicates that IRC-Galleria treats reports about illegal content and conduct as "top priority" and handles them "urgently". Any piece of content that is found to be illegal is immediately removed from the site, but is kept by the provider in case the police may further need to investigate the case. IRC-Galleria cooperates with local authorities and "immediately reports illegal content or conduct to them."

It is not mentioned in the self-declaration if the service provider includes relevant links to any local agencies or organizations in order to support the process of reporting illegal content or conduct.

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

In its self-declaration IRC-Galleria claims to provide its users with plenty of privacy tools (See Principle 3). Users also get safety messages when building their profile and using the community: e.g. when posting pictures users are reminded to consider the implications of posting their personal information online.

The self-declaration does not specify if the privacy settings options/status are prominent, visible and/or accessible at all times. It also does not refer to if the service provider automatically maps information provided by users (during registration) onto their profiles or if users are made aware when this happens.

Main findings in relation to the website

As the test demonstrates, on this SNS, minor users are only required to publish their user name. Also a recent profile picture of the user's face is required to acquire user status. The user does not have to share any other information with other users. The main privacy problem identified on the site is that users cannot customize their privacy settings to allow only specific users or groups to access (specific parts of) their profile information. Once published, the information is either public for all or for no one. Besides, certain information could not be made private. For instance, if one chooses to join communities or write information on the place of residence, dating status or motto, this information becomes automatically public. Users can, however, create picture folders that are visible only to specific groups.

Privacy settings are accessible from the profile and from every page, by clicking "Settings" (Asetukset). However, the privacy settings are not entirely visible when adding information to the profile. Users must click a separate link to get to privacy settings. While building the profile, users did not get information on which information would automatically be made publicly visible. After posting profile information the user could choose to hide certain information (date of birth, real name, place of residence etc.) from other users. However, once made private no one can see that information, not even friends.

Users were not given any supporting information to help them make appropriate decisions regarding their personal privacy settings. It was mentioned briefly in the "Rules" (Säännöt) that pictures posted on the site may stay on the internet even after being removed from the site. Deleting one's profile was very easy and convenient.

By going to the profile page, the user can delete the profile within a few clicks. The instructions are easy to understand. The site gives the user opportunity to sign in again within the next 48 hours to resume the user profile. The site informs the user that after 2 weeks the account would be removed. The provider neither stated if they would collect/retain any information from the user nor if this information would be used in any way after deleting the profile.

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

Main findings in relation to the self-declaration

In its self-declaration IRC Galleria indicates that their Moderation team are "social media experts trained to identify illicit activities inside the community", for instance detecting fake accounts or any other type of suspicious, inappropriate or illegal activities (e.g. bullying). According to its self-declaration the provider employs a "preventive approach" towards privacy and other safety-related issues including educating users on how to use the Internet safely.

It is not explicitly mentioned if the moderators are in direct contact with children. Although the self-declaration states that these candidates are "properly trained to identify illicit activity" on the site, nothing is mentioned in the self-declaration regarding the steps taken by the provider to minimize the risk of employing candidates who may be unsuited for work involving real-time contact with minors.

Principle 7 was not tested in the website.

Summary of Results and Conclusions

IRC-Galleria has implemented Principle 4 very satisfactorily on its website, Principles 1 and 2 have been rather satisfactorily implemented while Principles 3 and 6 have been unsatisfactorily implemented. The testing on the website revealed some problematic areas, for instance:

- The default full profile of minors is not set to ‘private by default’ as defined by the Safer Social Networking Principles.
- Under-aged users can easily register on the site by simply changing their age birthday on the registration form.
- Users cannot customize their privacy settings to allow only specific users or groups to access (specific parts of) their profile information.
- Once published, the profile information can be made public for all or for no one. Besides, certain information could not be made private at all.
- Reporting mechanisms (other than the Reporting buttons located next to user-generated content) are user-friendly, age appropriate and rather easy to find on the site. However, they are neither effective nor expeditious.
- Only few tips targeted at minors on how to navigate the internet safely in general are provided.

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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