

NASZA KLASA (NK)

*Aldona Zdrowowska, Warsaw School of Social Sciences and Humanities, Poland
Verónica Donoso, Appointed Research Coordinator by the EC*

Introduction

Nasza-Klasa (Our-Class) is a Polish language social networking service available to users of all ages. The site began operating in November 2006 and is very popular among Polish internet users, with more than 13 million registered and active users by the end of 2010. The main idea in the beginnings was to provide a communication platform, where users could find “old” colleagues from school and stay in touch with their classmates, schoolmates and friends. Throughout years, Nasza-Klasa evolved into a full-featured social networking service, where users can create profiles, post comments, publish multimedia content, communicate with others and play games. Among the main functionalities available on NK site are: profiles for classes and schools where current students and alumni gather, groups and forums, micro-blogging service (“Śledzik”), internal communicator NKtalk and mobile version of the service. From 2010 Nasza-klasa started using the brand name “NK”. The website addresses are: nk.pl, nasza-klasa.pl.

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

Summary of main findings

Users of NK site are provided with a range of privacy settings along with supporting information to help them make informed decisions about the information they post online. Although by default, most of the crucial information that minors post in their profile is only visible to people who are listed on the youngster’s “friends list”, minors can still be contacted by users who do not belong to their contacts lists. Additionally, minors' contacts list is also visible to non-friends. Therefore, the full profile of minors is not set to “private by default” as defined by the Safer Social Networking Principles. NK users’ profiles are invisible for external search engines such as Google. In NK’s internal search engine, no results were returned when typing in the first and the last name of the minor created for this profile. Only after adding the minor’s place of residence (“Paulina Nowak”+Warszawa) the profile of the minor created for this test appeared in the results.

Reporting inappropriate content and conduct in NK is quite straightforward. It can be done via e-mail or by simply clicking on clearly identifiable “report abuse buttons” prominently placed next to user-generated content (e.g. photos, comments, etc.). Reports are acknowledged and handled effectively, although not expeditiously. It took 4 days for the reporting user to get an answer from the provider, as opposed to the maximum responding time of 48 hours stated in the self-declaration.

The safety and privacy information provided on NK website is easy to find and covers many online safety issues from general advice and tips on how to use the internet safely and wisely, to instructions on how to cope with specific types of abuses. The “Safety” section provides considerable amount of various information targeted at children, young people, parents and teachers, as well as the general public. NK provides easy-to-use and easy-to-access mechanisms designed to limit users’ exposure to inappropriate content and/or to restrict unwanted communication and interactions with other users.

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 NK provides *clear* guidance and safety information specifically targeted at children and young people on how to navigate their website safely (e.g. via The use of cartoon characters Sekurion and Proteka to provide personalized safety tips to children and alert them about new safety content). According to the self-declaration, the Safety section provides dedicated sections for parents and patrons as well, but not for teachers. Here general safety information is provided as well as links to relevant local safety organizations (e.g. Kidprotect.pl).

According to the self-declaration, the Terms of Use and privacy Policy specify appropriate and inappropriate behaviour on NK. Key information about the Terms is provided in “strategic places” throughout NK so that users can be timely reminded of the conditions ruling the site. However, the self-declaration does not mention if this information is age-appropriate or easy for children and young people to understand. However, a simplified version of the terms especially dedicated to youngsters is foreseen (Vademecum of Terms of Use).

No explicit information on the consequences of inappropriate behaviour on the website is stated in the self-declaration. No information on the available technological tools for parents in order to monitor their children is found on the self-declaration, either.

Main findings in relation to the website

The “Safety” (“Bezpieczeństwo”) section of the site has areas specially dedicated to children, young people, parents and teachers. It contains relevant safety information such as dealing with personal information protection issues (legal and practical), how to report an abuse, how to ask for help on the site, etc. Specific information and tips on coping strategies are also gathered in the “Abuse” (“Nadużycia”) subsection.

The information is presented in many different formats, suitable for the different aforementioned target groups. For instance, in the “Children” (“Dzieci”) subsection there is a comic story about internet risks and how to avoid them with links and telephone numbers to child safety organizations provided. “Children” and “Young people” (“Młodzież”) subsections also contain video formats and textual advise – in both cases the language is appropriate for the intended audience. In a subsection addressed to both children and parents surfing the internet together (“Common play”, “Wspólna zabawa”) there are printable PDF documents “netiquette” (“netykieta”) and “refrigerator contract” (“umowa lodówkowa”). The latter consists of a set of rules for navigating the web safely and responsibly - to be printed, signed by a child and parent(s) and placed in a visible place at home, e.g. on a refrigerator.

Privacy policy issues are addressed in several areas of the site: in the “Privacy Policy” section of the site, in the “Help” and “Safety” sections and in article 5 of the “Regulations” document. Safety section as well as privacy section are easily accessible and provide plenty of relevant information for users and non-users of the site regarding general advice and tips on how to use the internet safely and wisely, to instructions on how to cope with specific types of abuses on NK site.

Content and conduct that is not allowed on NK site and the consequences thereof are defined in the “Terms of Use” in the “Regulations” document (“Regulamin”). “Terms of Use” article may be discouraging and difficult to understand for children and younger users due to the formal language it adopts. No clear and concise “Code of Conduct on NK website” targeted specifically at younger children was found.

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

Main findings in relation to the self-declaration

NK self-declaration does not mention what the minimum age requirement is to register on NK or if a minimum age requirement applies at all. It only states that “a person under 18 must have adult permission to use nk.pl”. Apart from requiring parental permission to register on the site, NK does not refer to any other mechanism to ensure that underage users do not register on the site or any other measures to identify and delete under-age users from their services. However, the latter would only be relevant in case NK applies a minimum age requirement, what cannot be inferred from its current self-declaration.

In its self-declaration NK refers to the mechanisms through which the service provider ensures limited exposure to potentially inappropriate content and contact by children, e.g., access to profiles of minors is restricted (although their basic information can be searched via the internal search engine); “alien” users cannot provide any actions on the minors’ accounts; a “wrong links validator” deactivates dangerous links (but it is not specified what “dangerous” links are); a family filter helps to find and remove swear words; etc.

NK does not refer to the ways in which this service provider promotes the uptake of parental controls in its self-declaration.

Main findings in relation to the website

Nasza-Klasa is available to users of all ages. Therefore, no minimum age requirements apply to subscribe to this SNS. Even though the “Regulations” document states that an official carer’s consent is required from minors who want to become NK users, parental consent was not verified (nor prominently reminded of) during the registration process.

During the testing two additional mechanisms designed to limit users’ exposure to inappropriate content were found. First, a pop-up notification for users uploading single photos (not visible while uploading multiple ones) warning them that erotic and inappropriate photos would be deleted from the site. Second, the option to “automatically add those who use swear words on my profile to a black list”. The “swear words” filter is set to “off” (not “ticked”) by default. During the testing, a message containing swear words was posted on the minor’s profile (created for the testing purposes). Also two of the pictures - published in that profile - were commented with swear words. These offensive comments were not spotted by the system when the filter was set to “off”. At first, setting the filter to “on” (without removing offensive comments first) did not result in “swearing” being put to a black list. Apparently, the filter is not retroactive. However, when the filter is set to “on”, an attempt to post a new comment containing swear words was unsuccessful. A system message was displayed with a request to correct the inappropriate message. A further attempt to post an offensive comment – without removing the swear words - resulted in blocking the offending user. Still, it was possible to put offensive comments under pictures in minor’s profile (in the gallery). The system did not react to it in any way. To sum up, it was found in the testing, that the filter is partly effective.

Principle 3: Empower users through tools and technology

Main findings in relation to the self-declaration

In its self-declaration NK refers to several tools and technologies to assist children and young people in managing their experience on their service, among others the possibility to control relationships made in the service; option to reject friend's requests, to block unwanted guests (Black list) and to remove comments; possibility to report photos that violate the Terms of Use, etc. If they wish, users are allowed to hide their profiles and make them invisible for search engines.

It is not clear from the self-declaration if profiles of minors are set to "private by default"¹ as defined in the Safer Social Networking Principles²; however NK claims that by default, any crucial information (e.g. photos, school name, age, etc.) that minors post in their profile is only visible to users who belong to the youngster's friends list.

The self-declaration does not include any information on the available safety tools to help parents protect young people, although, as previously mentioned, it does provide targeted safety information.

Main findings in relation to the website

During the testing, several mechanisms to assist (minor) users in managing their experience on NK site were found confirming what is stated in the self-declaration, for instance, the possibility to remove unwanted content or prevent postings on one's profile. Users of NK website may delete any kind of content they have posted/published on the site. They are also able to delete comments that others have posted on their profile (by clicking "remove comment" button) and to untag a picture ("remove a pin") tagged with their name. The "Remove post" functionality, mentioned in the self-declaration was not found in forums.

In a newly created minor's account, the profile is set to "private" ("profil prywatny") with limited information visible to those who are not "friends" of a user and more restricted than a default adult profile. Personal information visible to "non-friends" in the default "Private Profile" comprises: real first and last name and gender (required during the registration process and inserted automatically to a user's profile) as well as minors' contacts list and some additional information such as the place of residence (but not the address) and games (to which a user subscribed). Even though the profile of the minor created for this test contained more personal information (e.g. telephone number or pictures), this information was not revealed to non-friends. By default, "non-friends" are not able to put comments on one's profile, to comment and/or rate his/her photo or to add one to a "followed persons" list. However, the "default "private"³" settings of a profile do not prevent minors from being contacted by others (e.g. adults), who are not one's "friends". To prevent "non-friends" from being able to view any part of a user's profile or to contact a user in any form, one has to block that particular person. In sum, the default "private" setting of minors in NK does not match the definition of "private by default"⁴ of the [Safer Social Networking Principles](http://ec.europa.eu/information_society/activities/social_networking/docs/sn_principles.pdf),

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

³ There is an option in privacy settings allowing a user not to receive messages, comments and invitations from "fictional" accounts. By default it is set to "off".

⁴ http://ec.europa.eu/information_society/activities/social_networking/docs/sn_principles.pdf

namely “that the full profile cannot be viewed or the user contacted except by ‘friends’ on their contact list”.

By default, the search for a minor’s profile in external search engines – Google, MSN Search and Yahoo – did not return any results. When typing in the first and the last name of the minor created for this profile In NK’s internal search engine (as a non-friend), no results were returned, either. However, when adding the minor’s place of residence (“Paulina Nowak”+ Warszawa) the profile of the minor created for this test appeared in the results, but, as previously stated, it only revealed limited personal information to “non friends”.

The default privacy settings can be changed to less or more private according to the user’s wish. When set to “invisible”, which is not the default privacy setting for minors in NK, the profile does not even appear in the internal engine search results. Yet, some personal information (first and last name and gender) is visible to visitors entering one’s profile from links (list of “friends”) in other users’ profiles. Those visitors will also be able to send a message or an invitation to become a “friend”. Only blocked users (in the black list) are totally denied access to one’s profile, which also means that they are not able to contact him/her.

During the testing, no mechanisms to restrict or limit contacts between minors and adults – based solely on age differences - were found on NK site. There are, however, mechanisms available to restrict (entirely or to some extent) unwanted communication and interactions with other users in general (e.g. “friend” – “non-friend” status, and ability to reject a “friends” request and/or other forms of communication (from strangers), etc.).

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

The self-declaration refers to several mechanisms to report inappropriate content, contact or behaviour: a ‘Block user’ button is placed in every profile; a ‘Report abuse’ and a ‘Remove comment’ button are placed under every picture published, under every comment and next to each micro blogging post and comment; a ‘Remove post’ is found in every forum. Furthermore, a link to ‘contact’, where users can notify their issue, is placed on every page of NK.

The self-declaration includes specific information about how users’ general requests, and reports of abuse, in particular, are handled: Every user gets a standard e-mail acknowledging receipt of their notification. These notifications are then reviewed and users are sent a reply within 48 hours. In case of reporting “any kind of abuse the actual reaction time is less than couple of hours”.

Main findings in relation to the website

As stated in the self-declaration, NK users are provided with several easy-to-access and easy-to-use mechanisms, which allow them to report abuse including a general contact form or by clicking an easy-to-use and easy-to-find “report abuse” button placed next to every piece of user-generated content (e.g. pictures, comments and posts). The “Help” and “Safety” sections provide comprehensive information on how to report an abuse, how the report will be handled by NK and other options to get help.

A general “Contact form” can also be used to report abuse. This form is placed in the footer of each page of the site. When reporting an inappropriate content through a contact form, apart from composing a message, a user is required to provide a link to a page where the content is posted. As a part of the testing, a message was sent reporting on a bullying situation involving bullying pictures and nasty comments. A message was sent through a general contact form. According to the advice found in the “Help” pages. A “report an abuse related to pictures” topic was chosen from options available in the form and a link to a “nasty” picture was provided in the message. As a result, the reporting mechanism sent an acknowledgement e-mail within a few minutes, providing a case number and information on how long it typically takes to receive an answer (48 hours). The full reply to the potential user at risk was sent four days later stating that a warning message had been sent to an indicated user with request to remove the questioned picture and, if that user did not remove it in two days – the picture would be removed by the provider. The “bully” did receive a message with the request to remove the bullying picture. Therefore, the reporting mechanism on NK website proved to be effective, although not as expeditious as expressed in the self-declaration.

Principle 5: Respond to notifications of illegal content or conduct

Main findings in relation to the self-declaration

Nk.pl employs human and automated forms of moderation in order to identify potential risks for minors. In order to detect potentially illegal or prohibited content (e.g. obscene photos, swear words, etc.) the Customer Service scans the site and removes the inappropriate/illicit content as soon as possible. They also employ filters to catch illegal comments, data and subtitles. User-generated reports are also employed to identify potential safety threats.

NK states that they work closely with lawyers and police officers and in case of suspicion of a crime being committed, Nk.pl specialists report it to the corresponding civil services.

For 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

According to its self-declaration, users of NK are always allowed to modify their privacy setting options and are provided with supporting information to help them make informed decisions about the information they post online. Indeed, the Privacy Policy provides information on how to manage personal data. NK also encourages users to treat their personal data seriously via different ways including periodic privacy raising awareness campaigns. There are 3 main privacy settings available in NK: “open profile”, “private profile”, and “closed profile”. Besides, individual privacy settings can also be customized.

The self-declaration specifies that the privacy settings options are prominent and accessible at all times. The self- declaration does not explicitly mention if the information provided by minors during registration is (not) automatically mapped onto their profiles, however it does state that during the registration process users can hide all the information about themselves.

Main findings in relation to the website

Supporting the analysis of the self-declaration, users of NK are provided with a range of privacy settings along with supporting information to help them make informed decisions about the information they post online.

In spite of the wide range of available privacy options, privacy settings are quite easy to manage. Most of the available options seem self-explanatory. There are three predefined settings – “Private”, “Closed” and “Open” profile - but no clear description of predefined settings was found. Privacy settings and preferences are easily accessible through a link “Edit profile” (“Edytuj profil”) placed in the right top corner of every page in the service.

NK users are able to choose what will be visible - to “friends” and “non-friends” respectively - in their profiles. In the privacy settings a user may also decide whether “non-friends” will be allowed to post comments or rate a picture/photo on a user’s profile or to add a user to “followed persons” list. It is also possible to prevent others from tagging a picture with a user’s name and a link to his/her profile.

Testing also showed that it is easy to delete an account on NK site. After deleting an account, a user (former user) is notified that some personal information will be retained in the provider’s databases, although it is not clear what information exactly. If a user wants his/her personal information to be deleted permanently, he/she needs to contact provider.

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

Main findings in relation to the self-declaration

As mentioned in Principle 5, Nk.pl employs human and automated forms of moderation to identify potential risks for minors including illegal or prohibited content. These mechanisms include the use of filters, user-generated reports and/or human moderators to expeditiously review and, if necessary, remove the inappropriate/illicit content. It is not clear from the self-declaration how NK assesses the effectiveness of their services to identify potential safety threats.

Nk.pl makes sure to provide selected employees from customer service with special training so that they can appropriately deal with ‘tough cases’ (how to respond, how to act with sympathy, etc)”.

Principle 7 was not tested in the website.

Summary of Results and Conclusions

According to its self-declaration, NK has implemented Principles 1, 2 and 6 very satisfactorily and Principles 3 and 4 rather satisfactorily on its website. The testing on the website and the analysis of the self-declaration revealed some problematic areas, for instance:

- Although by default, most of the crucial information that minors post in their profile is only visible to people who are listed on the youngster’s friends list, minors can still be contacted by users who do not belong to their contacts lists. Additionally, minors’ contacts list is also visible to non-friends. Therefore, the *full* profile of minors is not set to “private by default” as defined by the Safer Social Networking Principles.

- Reporting inappropriate content and conduct in NK is quite straightforward. Reports are acknowledged and handled effectively, although not expeditiously. It took 4 days for the reporting user to get an answer from the provider, as opposed to the maximum responding time of 48 hours stated in the self-declaration.

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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