

NETLOG

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Introduction

Netlog is a social networking platform, targeted towards European youngsters, with more than 72 million members. Netlog was founded in 2000, first as a social network site in Belgium, but rapidly spread inside and outside the European Union. The SNS provides tools to build an online identity (profile) to connect and communicate with friends and other persons. Moreover, members can play online games, post and watch videos, share information on events and music. Netlog users also can access information on brand pages by becoming fan of a company or brand, leave comments and participate at polls. A mobile application gives subscribers the opportunity to be connected everywhere. Subscribers must be at least 13 years old.

The following is a report of findings of the analysis of the self-declaration provided by Netlog and the testing of both the Dutch and the German versions of the website in Belgium and in Germany, respectively. The tests were conducted in December, 2010 – January, 2011.

Summary of main findings

Even though Netlog stipulates that subscribers must be older than 13 to register on the site, users younger than 13 can easily register by simply “faking” their year of birth¹. Netlog offers a broad range of sophisticated privacy options. However, the default privacy settings of minors are not set to “private by default”² as defined in the Safer Social Networking Principles³. In fact, registered users, even adults that are not befriended with the minor, can see nearly the whole profile information including the school they attend, pictures or blog entries; but no contact details. Yet, users can easily restrict access to their profile or block specific users if they wish so. Moreover, SNS visitors who are not registered cannot view the profile. As far as contact possibilities are concerned, adult users can send a friendship request to minor users, but no accompanying personal messages can be added to motivate their requests.

Regarding the types of content minors are exposed to, when signed in as a 15 year-old child in both the German and the Dutch versions of the site, different types of advertising were displayed. Some of the banners included (fake) prize winning notifications and invitations to take part in lotteries by providing contact information. Although no advertising about alcohol was found, it was still possible for minor users to access some pages dedicated to alcohol brands by inserting brand names of famous alcoholic beverages in the brand pages search engine.

¹ The provider states that if moderators have doubts on a profile owner’s age, e.g. because the user on the profile appears to be too young, ID is asked for.

² “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”.

³ http://ec.europa.eu/information_society/activities/social_networking/docs/sn_principles.pdf

In relation to the reporting mechanisms provided by Netlog, these are user-friendly and age appropriate. Besides, Netlog provided a rather satisfactory personalised answer to the “bullying” report created for this test, although only in the German case. The Dutch report remained unanswered and the offending content remained on the site.

Regarding the online safety information available on the site, The Safety Centre informs users on important safety issues such as privacy, grooming or cyberbullying and provides information and links to educational websites as well as tools for young people, parents and teachers.

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 Netlog provides *clear* guidance and safety information specifically targeted at children and young people on how to navigate their website safely (e.g. via diverse media, cartoons, videos, etc.). Most of this information is found in the Online Safety Centre which also provides useful links for parents and teachers in all Netlog languages. The Terms & Conditions, Privacy Statement, Code of Conduct and FAQs are easily and clearly formulated. Moreover, Netlog members are reminded about privacy options on various places throughout the site.

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

Main findings in relation to the website

As stated in its self-declaration, the Dutch version of Netlog dedicates several web pages to e-safety. The Safety Centre is divided into dedicated sections for youngsters, parents, teachers and police forces, next to a general online safety webpage. The safety information includes links to the Terms of Use, Privacy Statement, FAQ, etc. and is accessible for both registered and non-registered users from the footer of the homepage and each other page. The German version of Netlog does not provide any targeted information or educational materials for parents and teachers on how to foster children’s responsible and safer internet use⁴.

In the section targeted to young users in the Dutch version of Netlog, e- safety tips are formulated in short and easy to understand paragraphs (e.g. choosing a strong password, being careful with personal data, etc.). Users are also informed about possible abuses and contact-related risks such as cyberbullying or grooming. The German version of the site, however, provides very little safety targeted guidance and educational materials. In both language versions, although some links to other awareness raising organizations are announced at the bottom of the online safety page dedicated to youngsters, these links could not be found during the test.

The Safety Centre in the Dutch version of Netlog provides some cartoons and videos on popular e-safety issues. However, the majority of the videos are from foreign awareness raising campaigns in English. Yet, they are accompanied by short and practical texts in Dutch that summarize specific risks and tips to cope with them. On the contrary, the German version

⁴ According to the provider the new version of the Security Center would be launched on February 8th, on the Safer Internet Day.

of Netlog did not provide any audio-visual material at the time of testing, although later on it was possible to find such information on the site.

In both language versions, the Terms of Use are only presented in textual format. They explain different aspects of forbidden uses and behaviours on the site. Although this text is well structured, some paragraphs include specific jargon (e.g. “legal competence”, “free from liability”) that may be difficult for young users to understand. Moreover, the text is long and, thus, not appealing to a (young) audience. A Code of Conduct summarizes prohibited conducts, in short and generally easy to understand paragraphs. However, in some parts specific (judicial) jargon (e.g. intellectual property) is still used in both language versions of this text.

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

Main findings in relation to the self-declaration

In its self-declaration Netlog states that the minimum age requirement to create an account in Netlog is 13. Minors (older than 13) can register on Netlog but they need parental permission to be able to do it. Parental consent is, thus, the only mechanism through which this service provider promotes the uptake of parental controls. If Netlog happens to find out that someone is lying about their age, the account is blocked. The self-declaration does not include information on the steps taken by the provider in order to prevent users from attempting to re-register with a different age if they have previously been rejected for being below the minimum age.

Netlog refers to several mechanisms to ensure the limited exposure to potentially inappropriate content and contact by children (e.g. “closed” privacy settings of minors which do not allow adults to contact or search for minors; pictures and videos are moderated upon upload and blocked items are hashed so it is not possible to upload them again; etc.). Netlog also restricts some brand pages, ads and applications (e.g. alcohol-related ones) to ensure that they are only accessible to adults while only safe advertising banners are displayed on the site. Furthermore, content on Netlog is automatically filtered according to the user’s age and location so as to ensure that minors only see content posted by other minors and not by adults.

Main findings in relation to the website

In both language versions of Netlog, the provider clearly states in the Terms of Use that minimum user age is 13 and that nobody below that age can register. Netlog promotes the uptake of parental controls by writing in their Terms of Use and the Security Centre that minors need parental permission to register on the site. However, no documents signed by parents or any other proof of parental consent needs to be handed in order to become a registered user.

In both language versions of Netlog tested, when a visitor wants to register, some basic personal data have to be provided, including the date of birth. The year of birth has to be selected from a drop-down menu (earliest year is 1997). Although in theory, visitors younger than 13 cannot select their real year of birth, the test in both language versions showed that children younger than 13 can easily subscribe by selecting a *suitable* year from the list. To subscribe (young) users need to entrust some personal data (forename, family name, gender and birth date) and if they wish so, they can add their place of residence, studies, school and contact details like e-mail, MSN, Skype account. In what the provider calls the *interview*, a user can add a lot more personal information ranging from hobbies to favourite brands.

However, contact details are not accessible for adult users who access the profile, only minor users.

The welcome page of Netlog includes the so-called spotlight: Pictures and blog entries other users want to present in this 'spotlight' are displayed here. When signed in as a minor, only contents provided from other minor users were shown. Even though in its self-declaration Netlog claims that content is automatically filtered according to the user's age and location (so that minors can only see content posted by other minors and not by adults), the test in both language versions of the site revealed that minors can visit profiles of adults and see their content (e. g. pictures, videos and so on) without any restrictions.

Regarding advertising, when signed in as a 15 year-old child in both the German and the Dutch versions of the site, different types of advertising were displayed. Some of the banners include (fake) prize winning notifications and invitations to take part in lotteries by providing contact information. Small banners as well as *intermercials* (an internet commercial for a new movie, for instance) were also found. As opposed to what is claimed in the self-declaration, in the *brand pages*' section, it was possible for a 15 year old to consult pages about alcohol brands.

Principle 3: Empower users through tools and technology

Main findings in relation to the self-declaration

Although in its self-declaration Netlog indicates that "privacy settings of all minors are "closed" (Principle 2), the self-declaration also indicates that *all* users have the possibility to "tailor their availability and visibility to others" through an extensive range of privacy settings" so it is not really clear to what extent the profiles of minors are effectively "closed" especially considering that users can "choose who can contact them". Furthermore, the definition of "closed" profiles of minors does not fit the definition of "private by default", i.e. only available to user's approved contact list, stipulated in the Safer Social Networking Principles.

Apart from requiring parental consent of minors to register on the site (Principle 2), the self-declaration does not provide any further information on how Netlog supports parents be aware of the existence of other available safety tools/information (such as filtering tools or parental controls) to help them protect young people online. The self-declaration does not explicitly mentions how the safety tools and technologies employed by this SNS to ensure a safer experience for children and young people are assessed to ensure their effectiveness, either.

Main findings in relation to the website

In both language versions tested the profiles of minor Netlog users are not set to "private by default"⁵ as defined in the Safer Social Networking Principles⁶. As a matter of fact, all Netlog users (including adults who do not belong to the minor's approved contact list) have access to minors' profiles and are even allowed to send friendship requests by simply inserting the forename of the minor in the Netlog search engine. By contrast with adult users, minor users can also send personal messages. Adult users are not able to send personal messages, except when they are befriended. This contradicts the self-declaration's statement that "Privacy settings of minors are "closed", i.e. they cannot choose to show their profile to everyone.

⁵ "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".

⁶ http://ec.europa.eu/information_society/activities/social_networking/docs/sn_principles.pdf

As revealed by the test, profiles of minors can only be found by other Netlog users, though, (and not via external search engines) and adults trying to access minors' profiles are warned that they are going to access a profile of a minor. Yet, access is given immediately after closing this warning. Adults can, thus, easily see nearly the whole profile information of minors, such as personal data, pictures, blog entries with the sole exception of the minor's contact details.

When visiting the profile of the minor and trying to write a comment in the guest book or next to pictures, a warning is given. Due to the fact that the profile owner is a minor, adult visitors (who are not friends) are not able to post comments; however, they are still able to send a friendship request to minors, without comments, and may eventually become their friends. In other words, adult users can only send an unmotivated friendship request to a minor.

As the test in both language versions shows, by default, when friends post comments, they appear immediately on the profile. However, this can be restricted so that the (young) user can approve comments before they are published. Users can also delete comments that have been inserted by their friends. When clicking on the "more settings" link, a user can decide whether ratings and comments are permitted on their profile or not (by default permission is given), or who can see their pictures (by default every Netlog member). In short, technical guidance is given and privacy settings can be adapted. Although no specific warnings are given when uploading a picture, the user can see the privacy settings next to the uploaded photo. Direct access is given to adapt viewing, commenting and rating by other users. Besides, users are informed by e-mail when another user has tagged them in a picture.

Besides, in both language versions tested, users had the option to make their profile only accessible to members of Trust⁷, i.e. Netlog users who are committed not to abuse the site. Profile owners can choose who is able to contact them also by using a «whitelist» and block certain users from accessing their profile by means of a «blacklist». These options can be easily found in the profile settings section. Brief and clear explanations are given in this section as well as the FAQ.

As the testing in both language versions shows, in general, most privacy settings are clearly defined and easy to adapt and users can restrict the access to their profile to friends and eventually the friends of their friends. Users can also restrict access to specific age groups. When registering as a 15 year-old, for instance, and selecting the option to restrict profile access to some SNS users, it is suggested to restrict the profile to users between 13 and 20 years old.

Apart from the parental consent referred to in Principle 2, Netlog does not provide any other tools or information to educate parents about available mechanisms to help them protect their children online.

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 indicates that all Netlog visitors, registered and not, can easily report inappropriate content by clicking on the report abuse button found next to all types of user-generated content (profiles, pictures, blog messages, etc.). To facilitate reporting a list with the most common reasons for submitting a report is provided so that users can easily select the type of abuse they have been confronted with. Apart from the report abuse buttons it is

⁷ [Trust is Netlog's security label](#) that confirms the users' commitment not to abuse the site "for spamming, uploading pornographic material, disturbing users, stalking, paedophilic activity, or using the site for ulterior purposes for which it was not intended". Trust members are thought to be less likely to breach the Code of Conduct because in case of abuse from a "Trusted member", they can be identified /blocked by using a mobile phone number instead of an IP address.

possible to send reports via specific e-mail addresses, postal address, helpdesk and fax. Trained Community Managers and Assistants check these reports 24/7 and prioritise them according to the amount of complaints. Besides, there are Netlog volunteer moderators who can support users solve their enquiries.

The self-declaration neither includes information on if the reports are acknowledged nor if users are provided with an indication of how their reports are typically handled.

Main findings in relation to the website

Both language versions of Netlog provide two mechanisms to report inappropriate content: First, a report abuse button is provided. As stated in the self-declaration, this button can be found next to user generated content (e.g. comments on a profile, e-mails, pictures/videos). It is easily accessible and clearly identifiable as it represents the figure of a policeman. A click on this button opens a short and easy to use online form where users can indicate which kind of abuse they have been confronted with (e.g. sexually explicit material, child abuse, violence, etc.). Reporting can also be done via email. This might be not so easy to do for young people as they first have to search the email address located in the Code of Conduct or in the Terms of Use.

In both versions of Netlog tested, although the report mechanisms are clearly present in several parts of the SNS, no information could be found explaining how the reports are handled. In the Terms of Use the provider states that if the complaint is grounded, measures will be taken (like putting offline the illicit content). However, which concrete steps are taken and the time needed to respond, are not dealt with. The documentation about how users can report abuse and misbehaviour includes textual information about possible punishments of abuse. In the Dutch version of the site users are given information on how to contact eCops, the Belgian governmental contact point for internet abuse. Registered users can also find the number of the Belgian hotline and its e-mail address. In the German version a link to eCops is provided, but no further information on how to contact them.

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. In Belgium, the “victim” sent a report via the report-abuse button that was visible next to the embarrassing pictures. An online form popped up where the user could select a reason for the report (in this case *bullying*, «*pesten*»), was selected). The online form included also a field where the user entered more details concerning the abuse. After sending the form a message appeared on the SNS webpage confirming that the report had been sent. The same day, a message was received confirming the reception of this report and that a moderator would deal with the abuse. However, no further reply was received during the month following the abuse report. Moreover, the embarrassing pictures and comments used in this bullying scenario were not removed and no measures were taken against the “bullies”. In Germany the same bullying situation was set up, but this time the bullying report was sent via email. The test e-mail was answered the day after. It was friendly and explained that it was possible to put the two bullying users on the blacklist. The personal answer was written explicitly for the test bullying report (no standard text was sent). However, this message only told that it was possible to put the two bullying users on the blacklist but not how to delete the content. The ‘victim’ sent

another email asking how to delete the bullying content (December 20th, 14:49). This e-mail was replied by Netlog 2 days later asking where the offending pictures were located, but not instructing Astrid on how to delete the offending content. This last e-mail was never replied by the minor. However, explicit information regarding where the offending content was located and who the bullies were had been explicitly provided in her first e-mail. Still, the embarrassing pictures and comments were not removed from the site and the bullies were not reprimanded for their inappropriate behaviour.

In sum, the reporting mechanisms provided by Netlog are user-friendly and age appropriate. Besides, Netlog provided a rather satisfactory personalised answer in the German case. However the Dutch report remained unanswered.

Principle 5: Respond to notifications of illegal content or conduct

Main findings in relation to the self-declaration

Netlog states that they report all law violations (racism, child porn, etc.) to eCops, an online reporting service of the Belgian federal Computer Crime Unit. In case of international crimes, Netlog transfers the issue to their international associates. But it is not explicitly mentioned if they have effective and expeditious processes in place to review and remove offending content.

In case of offences that are prosecuted only upon complaint, Netlog guides the members to the right authority.

Netlog claims to liaise with police officers from the Federal Crime Unit about actions taken by Netlog and constantly receives information from the police on new techniques employed by, for instance, paedophiles. With this feedback Netlog is not only able to improve and develop automated tools to protect its younger members, but also to continue training the Community Managers and Administrators so that they can detect such behaviour. Finally, Netlog saves all data in case the police may need it.

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

According to its self-declaration, users of Netlog are provided with a range of privacy setting options and with supporting information to help them make informed decisions about the information they post online. Indeed, Netlog's safety centre and FAQ provide information on how to ensure online safety in general. Trained staff safeguards users' safety and reacts promptly if users' privacy is endangered. During registration, Netlog asks very basic information only. Users then decide by themselves what other information they want to share on their profile.

The self-declaration does not specify if the privacy settings options are prominent and accessible at all times. Netlog does not include information on if users' information (provided during their registration) is automatically uploaded onto their profiles.

Main findings in relation to the website

As stated in the self-declaration, in both language versions tested, Netlog provides clear and easy to use privacy settings. Besides, during the registration procedure, a user only has to provide few mandatory personal data (name, e-mail, date of birth, chosen password)⁸. While registering, a link is provided to the Terms of Use (including a link to the privacy statement). Registration is only active when the new user clicks on a hyperlink sent to the disclosed e-mail address. By default, all the personal information that is provided by the user, such as information in the interview, pictures, comments on pictures and videos, is shown in the profile of minors. However, the user can decide not to include personal information in the profile by "unchecking" the box next to a specific piece of information. Users can also conceal their online status.

Netlog provides a range of privacy settings regarding the four categories "To be found", "Access to profile", "Communication" and "Logs" (comments and changes of the profile visible for friends). Members can also choose one of the following basic settings: use their profile to meet new people (choice for basic privacy settings or high level of privacy protection), or to keep contact with the friends they already know (with also two levels of privacy). The privacy settings provide other functionalities as well, such as allowing users to pre-approve comments published to their profile.

The starting page of the privacy settings gives a clear overview of the settings linked to a specific privacy set. Yet, individual settings can be viewed and be easily adapted at any given time. In the Dutch version of the site additional information regarding privacy issues is given in other parts of the SNS as well. In the Safety Centre, for instance, users are informed about how they have to protect sensitive data like passwords and how they have to react on requests to provide sensitive information.

Although the Privacy policy is long (60 lines with a total of more than 600 words), it is well structured and essential information is included. The categories of personal data that are processed as well as the purposes of the data processing and users' privacy rights are summarized. Some technical terms are also clearly defined in footnotes, e.g. cookies.

⁸ Also a CAPTCHA is used in the subscription form: *Completely Automated Public Turing Test to tell Computers and Humans Apart* is a challenge-response system test designed to differentiate humans from automated programs (searchsecurity.com).

Finally, if a user wants to delete their profile, this can be found under settings, in the account section where a user is given the possibility to delete the profile. Moreover, information is inserted on how to delete your account in the FAQ-page (settings section).

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

Main findings in relation to the self-declaration

According to the self-declaration, Netlog assesses their service to identify potential risks to children and young people by engaging in debates with users, NGOs, police authorities and governments to assure that all these systems are constantly improved. Among others, Netlog participates in regular brainstorming meetings with the Belgian Federal Computer Crime Unit to update and build automated tools to protect its younger members (See Principle 5).

Nothing is mentioned on the steps taken by Netlog to minimize the risk of employing candidates who may be unsuited for work which involves real-time contact with children or young people.

Principle 7 was not tested in the website.

Summary of Results and Conclusions

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

- Although the privacy settings are said to be «closed» for minor users, still all registered users can, by default, have access to the minor's profile. In other words, minors' profiles are not set to "private by default" as defined in the Safer Social Networking Principles.
- Even though the minimum age requirement is supposed to be 13, visitors younger than 13 can easily register on the site.
- Even though the self-declaration states that parental permission to register on the site is required, this was not validated in the testing.
- Even though in its self-declaration Netlog claims that content is automatically filtered according to the user's age and location so that minors can only see content posted by other minors (and not by adults), there are no restrictions for minors to visit profiles of adults and see their profile content (e. g. pictures, videos, etc.).
- As opposed to what is claimed in the self-declaration, in the brand pages' section it was possible for a 15 year old to consult pages about alcohol brands.
- The reporting mechanisms provided by Netlog are user-friendly and age appropriate. Besides, Netlog provided a rather satisfactory personalised answer in the German case. However the Dutch report remained unanswered.

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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