

RATE

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Introduction

Being launched in May 2002, SNS Rate is the oldest and most popular national language based SNS in Estonia. As the site is only available in Estonian, the majority of its 290 000 users (<http://www.rate.ee/ads.php?act=1&lang=2>) are Estonians or Russian-speakers living in Estonia. The main aim of the site is to offer a photo-rating service but also to provide the users with additional opportunities e.g. sending messages to other users, chatting in forums, keeping a blog, reading horoscopes, converging among different communities, playing games, etc. Additional “advantages” (e.g. upload one’s photos to the site before the others; get a VIP status in a chat room, use the Compatibility-Meter in order to test one’s compatibility with certain users from the opposite sex, etc.) are only made available for the users who have purchased SOL’s, the monetary unit only applicable on the *Rate* website. There are no minimum age requirements.

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

Summary of main findings

Both non-registered users of the site as well as users not belonging to the friends list of minors have, by default, access to their profile images, videos, blogs as well as almost all the personal information contained in the MSN account of a profile owner are made private by default.

Findings of the testing of SNS Rate indicate that Rate has taken steps to ensure their users’ safety by informing the users about inappropriate behavior and content in their Terms of Use. A general overview about the Internet safety issues (both for children and parents) and links to additional information can be easily found on the site. Several opportunities are provided for reporting inappropriate content (images, private messages, comments, videos); users can easily reject “friends’ requests” or block other users. All profile images (up to 10) need to be approved by the moderators.

Still, gaps in the safety issues remain, for instance, all the profile images and the majority of textual parts of the profiles are accessible to non-users; no parental controls are provided, only certain parts of the profile could be made “private” or “accessible to friends only”; misleading information is provided about blocking one’s profile i.e. although the text under the box “block one’s profile” claims hiding one’s profile from other users i.e. so that the profile cannot not be found by the internal search engine, clicking the box also means that the entire Rate environment becomes automatically inaccessible for the profile owner; one is unable to delete the account at once, only to deactivate it. When reporting about inappropriate content e.g. inappropriate tagged images, the content is quickly marked as “forbidden” however it is not deleted by the moderators and hence it is still publicly available.

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 Rate provides clear guidance and safety information specifically targeted at children, young people and their parents on how to navigate the internet safely including information on the dangers associated to the internet and practical tips. In its self-declaration Rate does not specify if targeted materials for teachers or educators are provided and it does not include any information on specific educational materials, either. The self-declaration indicates that the Terms of Service are easily and clearly formulated and are accessible from the footer of each page. The provider claims that the Terms of Service provide simple information regarding inappropriate behaviour on the site (e.g. “disclosing personal information to other people”) as well as the consequences thereof (e.g. accounts may be suspended for breaching the Terms). The example given in the self-declaration is contradictory, though, because considering that the essence of any SNS is disclosing to some degree or another (some) personal information to share it with others, then almost all the activities of users on this SNS would have to be considered as “breaching the Terms”. No information on the available technological tools/controls for parents to support their children’s safe use of the internet (e.g. parental filters) is found in the self-declaration.

Main findings in relation to the website

Parents and children are able to find information about safety in the Internet Safety (“Internetiohutus”) section. Information is provided as a short text, followed by a couple of links to additional websites. Confirming the analysis of the self-declaration, there are no educational materials targeting teachers. Besides, the available information is easily accessible from every page and mainly written in age-appropriate and non-technical language. Parents are advised to create a profile in Rate in order to monitor the online practices of their children. In case of problems, parents are suggested to contact Customer Service (“Kasutajatugi”), or contact the police. In the Terms of Use the users are informed about what is considered as inappropriate content and behaviour on the site (e.g. one is not allowed to advertise one’s company or services by sending or posting information about it anywhere on the site; users under 18 years of age are not allowed to post photos with alcohol, smoking tobacco/drugs or water-pipe; one is not allowed to use someone else’s personal information on one’s own profile, etc.) and users are reminded that in case of abuse the user will be punished (e.g. a warning may be sent by the moderators or the profile may be blocked without any further notice). Hence, in the Terms of Use the information mainly focuses on the appropriate use of images and much less on general user privacy and safety issues. Indeed, these issues are not even presented with clear section labels (e.g. Processing the Data (“Andmete töötlemine” and Terms of Use for OpenSocial applications “OpenSocial rakenduste kasutustingimused”) so it may be difficult for minors (and for users in general) to figure out what type of safety information could be found under which section.

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 does not refer to any specific steps taken by the provider to identify under-age users or to prevent them from attempting to re-register on the site. The self-declaration does not state any minimum age registration requirement, either. However, it is

not clear from the self-declaration if this is because no minimum registration age applies in Rate or simply because the aforementioned information is missing.

The information that Rate provides in its self-declaration regarding the mechanisms to ensure the limited exposure of minors to potentially inappropriate content is very precarious. In fact, Rate only refers to one general available mechanism, namely, that the profile pictures are subject to the approval of the site's moderator (e.g. "adults posting pictures of children is not permitted", pictures displaying drugs or alcohol are not allowed on the site, etc. thus, pictures containing alcohol or children could be banned from the site.).

The self-declaration does not specify what types of services are considered as not appropriate for children and young people on the site (apart from alcohol-related content). Besides, it does not refer to the ways in which this service provider promotes the uptake of parental controls, apart from providing them with general safety information and tips (see Principle 1). Finally, the self-declaration does not refer to the existence of any means put at the disposal of users or content developers to age restrict, rate or label content where appropriate.

Main findings in relation to the website

There is no information provided about age restrictions i.e. the site is open to anyone, e.g. also for a nine-year old child, as the test on this website demonstrated. The age restrictions are clearly stated only in terms of uploading certain images. For example, the Terms of Use state that no photos of children from 0-6 should be uploaded on the site and no adult can post photos of children (not even photos of themselves as a child). It is also stated that photos that display minors consuming alcohol/drugs/tobacco/water-pipe cannot be uploaded, and the moderators have a right to decline photos where people appear to be drunk. When looking through the images most recently uploaded on Rate ("Uued") the users can automatically see the entries made by the users who belong in the same age group, however, confirming the analysis of the self-declaration, no additional means are provided by the SNS to age restrict, rate or label the content where appropriate. Parental controls are also not promoted by the site, but parents are advised to create a profile of their own in order to monitor their children.

When registering on the site both adults and minors need to fill in the same registration form, e-mail verification is needed only in order to make changes to one's profile. Users are unable to change their date of birth previously provided in the registration form unless they pay. The cost for changing the birth date is 3 SOL's. Several other services are available only in case you pay, e.g. uploading, changing and editing photos; rating the photos with the highest score; the amount of time it takes for the moderators to process your photos, etc. The cost of these services depends on the way one pays for them e.g. paying through an e-bank (1 SOL = 0.11 EUR), via SMS (1 SOL = 0.19 EUR), by making a phone call to a paid service (1 SOL = 0.20 EUR), or by a special phone-card (1 SOL = 0.14 EUR). When signing in as minor, banner ads can be seen. The services and products advertised are not specifically targeted to minors, but they are not (potentially) inappropriate, either.

Principle 3: Empower users through tools and technology

Main findings in relation to the self-declaration

Rate self- declaration does not provide any information regarding if the profiles of minors are set to “private by default”¹ as defined in the Safer Social Networking Principles². Besides, the self-declaration does not provide any information about the steps taken by the service provider to ensure that private profiles of users registered as under the age of 18 are not searchable via their services.

In relation to the tools and technologies employed by the service provider to assist children and young people in managing their experience on their service (particularly with regards to inappropriate or unwanted content/conduct), the self-declaration refers to only a few functionalities, namely, users can decide which parts of their profiles to make visible to whom (visible to friends or public), they can delete unwanted comments from their profiles (but nothing is mentioned about other types of content posted to their profiles), they can block contacts and reject friendship requests and they can report inappropriate contact (nothing is mentioned about inappropriate content, though).

Apart from providing general e-safety information (and guidance) for parents (see Principle1), no specific tools to promote the uptake of parental controls (e.g. filtering software) or specific information about them are mentioned in the self-declaration.

Main findings in relation to the website

Profiles of minors are easily searchable by their nickname both in the service search engine and via Google (but not through Yahoo! or MSN search). No search engine (neither in service search engine nor Google, Yahoo, MSN search) is able to find Rate users by their full name. Full profiles of minors are not set to private by default. In other words, both non-registered users of the site as well as users not belonging to the friends list of the profile owner have, by default, access to their profile images, videos, blogs as well as all the textual information on the profile (e.g. birthday, place of residence, education, profession, etc.) except the e-mail and MSN account of a profile owner. These are available for the people in the friends list only, by default. All profile images (max. 10) need the approval of moderators; only photos in the photo albums need not to be approved.

Adults can send friend requests to minors even if they are not in the friends list of the minor, which the latter can easily decline. All registered users of the site are allowed to comment the photos of minors, however, the option is not available to non-registered users. All users can also easily delete comments, personal messages, and character descriptions they do not like. Deleting that content is free of charge. Deleting a contact from the friends list is also easy; however, even though the contact will not appear in the friends list of the user initiating the blocking, no changes occur in the friends list of the person being deleted from the list. Users can also easily block persons they do not want to get access to their profile. Although blocking seems efficient at first, after having been blocked the system informs the “blocked” person that even though they have been blocked it is still possible for them to have access to as much information contained in the profile of the user who blocked them as any other “non-friend” of the user, i.e. by default, basically all the private information except the contact details (see Principle 3).

Users can also block their own profiles; however, blocking in that context actually leads to the deactivation of one’s own profile (two months after the user’s last login). Hence the

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 given by the system provider is misleading because even though it rightly states that after blocking one's profile the profile will not be searchable through a search engine and will not be accessible to other users, it is also true that after blocking one's profile the entire profile is deactivated even for the profile owner themselves.

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 two mechanisms to report inappropriate content, contact or behaviour, namely reporting abuse via the "Reporting Abuse Button" (e.g. for reporting pictures) and sending an e-mail to the webmaster in case of any violation of the Terms of Service. However, contacting the webmaster in case of violations of the Terms of Service does not seem the most appropriate nor the most logical option for users to report abuse because webmasters are normally associated with reporting technical problems rather than violations of the Terms of use.

The self-declaration neither includes information on if the reports of abuse are acknowledged nor if users are provided with an indication of how their reports are typically handled. The self-declaration neither provides information on if the reporting mechanisms are *easily accessible, easy to understand, age-appropriate or available at all times*.

Main findings in relation to the website

Rate provides several user-friendly and all time available options for reporting inappropriate content and behaviour. The “Report Abuse button” used for reporting about inappropriate content and behaviour can be easily found under every comment, community, photo, scrap, video, private message, etc. on the site. In case of problems users may also send a note to the Customer Service (“Kasutajatugi”) and not the webmaster, as stated in the self-declaration. The Terms of Use section also provides information about how to make an effective report and how the reports are usually handled (e.g. if the reply has been provided by the Customer Service, a notification is sent through the inside message system to the user who made the report). Moderators can also be asked for help by posting in a special section of a forum titled “rate.ee discussion” Link to the forum can be accessible from every profile by clicking on the application “In addition” (“Veel”) on the menu bar and choosing application of Forum.

Still, the site does not inform the users about these mechanisms in the Terms of Use. During the test a cyber bullying situation was simulated which consisted of sending nasty comments and photos to an underage user. As part of the test a bullying letter was sent to the Customer Service on the evening of December, 15. No acknowledgement and no reply was received. In the afternoon of 16 December the “Report Abuse button” was used for informing the moderators about the bullying situation. Using the “Report abuse button” is very convenient and easy and the moderators’ response to the problem took approximately 2.5 hours). Even after receiving a positive automated reply in answer confirming that the tagged photos were “forbidden by the site”, the tagged photos were only deactivated and not entirely deleted. Thus, both photos used in the “bullying test” were still publicly available on the site both on the profile of the abuser (original large image), as well as one the one of the abused (in small icons). Therefore, the abusive comments below the photos were present as well. The images were still up on the site by the time the test was completed and nothing happened to the “bullies”.

Principle 5: Respond to notifications of illegal content or conduct

Main findings in relation to the self-declaration

The self-declaration does not include specific information on if Rate has effective processes in place to expeditiously review and remove offending content upon receipt of notification of alleged illegal content or conduct. Nothing is mentioned on the mechanisms to decide what (offending) content to review and, eventually, remove from the site, however the self-declaration does mention that Rate responds to complaints daily and that “regular and frequent reports are generated flagging possible violation of the Terms of Service”. The self-declaration also mentions that Rates cooperates with “the law enforcement agency provided the complaint is filed with the police. However, proactive pursuit of potential perpetrators by the service provider is in violation of state laws.”

Because of ethical reasons Principle 5 was not tested on the site.

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

Main findings in relation to the self-declaration

Rate self-declaration does not clearly specify which privacy setting options are available for its users. It does mention though, that user privacy settings are “prominently made available on user’s profile page” and that “confirmations are asked before user submissions”. Still, this

information is very vague and it is not possible to infer from it what specific privacy options are available for (minor) users on this SNS.

The self-declaration does not specify if the privacy settings options/status are visible and/or accessible at all times, either. 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. However the self-declaration does mention that users can control “what parts of their profile are visible to friends or public” (See Principle 3).

Regarding providing users with supporting information to help them make informed decisions about the information they post online, Rate claims to display “contextual warnings” throughout the site. However, the self-declaration does not specify what type of content these “contextual warnings” display nor when they are displayed (next to all types of user-generated content? Whenever a user uploads a picture? Etc.).

Main findings in relation to the website

Only a few sections of the profiles (e-mail, phone number, msn account, last name, date of birth, photo album, and additional information for friends) can be made private by all users, including minors. All the other information on the profile is available to all, even non-registered users and it cannot be made private as there are no privacy settings that could be used. E-mail and Instant Messenger accounts of users are private by default, i.e. this information is only available to the users in the contact lists. While filling in one's profile a short notification about the privacy settings is displayed “e-mail and msn messenger accounts are by default made available to contacts in the friends list”. Later on the users can always adjust their privacy settings according to their own needs, i.e. if they want, they can make their e-mail and msn account available to all or to no one.

Users may also have a private rate.ee mailbox, so that only people on one's friends list and the ones who have given maximum points for one's photos, are able to send messages. As opposed to what the self-declaration states, namely that privacy settings are “prominently made available on user's profile page”, privacy settings mainly appear when making changes to one's profile and cannot, thus, be found easily.

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

Main findings in relation to the self-declaration

It is not clear from the self-declaration how the service provider assesses the effectiveness of their services to identify potential safety threats. Besides, no information on the mechanisms employed by the Rate to determine the most appropriate procedures for reviewing reports of illegal or inappropriate content or conduct is provided in the self-declaration. However, it does mention that “Regular and frequent reports are generated flagging possible violations of the terms of service”.

Regarding the steps taken by Rate to minimize the risk of employing candidates who may be unsuited for work which involves real-time contact with children or young people, Rate claims that their moderators and “super moderators” are not only carefully selected but also that “unsuitable moderators are replaced”. It is not clear from the self-declaration, though, who these moderators are, if they are in direct, real-time contact with minors, or what their monitoring tasks imply (e.g. reviewing content, replying to queries from users, etc.). However, Rate claims that they “play a large role in ensuring community's adherence to rules”. How this is achieved is not mentioned in the self-declaration.

Principle 7 was not tested in the website.

Summary of Results and Conclusions

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

- Users are unable to change their date of birth previously provided in the registration form unless they pay.
- Profiles of minors are easily searchable by their nickname both in the service search engine and via Google (but not through Yahoo! or MSN search).
- Both non-registered users of the site as well as users not belonging to the friends list of the profile owner have, by default, access to Minor's profile images, videos, blogs as well as all the textual information on the profile (e.g. birthday, place of residence, education, profession, etc.) except the e-mail and MSN account of a profile owner.
- Adults can send friend requests to minors, but these can be easily declined.
- Although blocking seems efficient at first, the system informs the "blocked" person that they can still have access to the profile of the user who blocked them by simply logging out from the site.

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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