

SCHUELERVZ

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Introduction

The platform schuelerVZ is one of the three social networking sites of VZnet Netzwerke Ltd. provided for the German market (studiVZ and meinVZ are the other two). It is aimed at German pupils from 12 to 21 years. SchuelerVZ exists since four years ago. Today, 5.8 million pupils are users of schuelerVZ.¹ Registered users are represented by a profile site where they publish certain personal information like hobbies, favourite music or popular movies as well as pictures. They can add other users as their “friends”, create or join groups where they can engage in discussions about topics they are interested in, and use channels for interpersonal communication such as direct messages or chat. SchuelerVZ is a stand-alone platform that is not open for general registration (new users need an invitation of an actual user to be able to join) and allows no interaction (e.g. no messages or friend requests) with users of studiVZ or meinVZ.

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

Summary of main findings

SchuelerVZ is an invitation only system that, in theory, only allows users aged between 12 and 21 years old.² A person younger than 12 (and older than 21) receives a message explaining that he/she is not allowed to register as a schuelerVZ user because of the age requirements that apply on the site. However, in practice, a person younger (or older) than what is established in the age requirements can re-do their registration process with the same invitation and subscribe by simply selecting a suitable date of birth.

The default privacy settings are very strict and the profiles of new registered users are set to “private by default”. This implies that because they do not allow access to any other Internet user and profiles of minors cannot be searched or contacted neither inside the social networking site nor outside (e.g. via search engines such as Google or Yahoo!) except by confirmed “friends” on the contact list. Possibilities to set privacy options are varied and sophisticated including “ignore function” and the possibility to pre-approve photo tags. Deleting a complete profile is easy-to-do and can be done by the “my account” section. One weakness has to do with the inefficiency of the reporting mechanism: Although reporting abuse is easy to handle for minors, the test revealed that SchuelerVZ neither reacted expeditiously nor efficiently to a bullying test report.

SchuelerVZ provides a wide variety of clear and targeted guidance and educational materials for young users as well as for parents and teachers. A lot of information specifically targeted at children including educational videos and concrete tips on relevant e-safety issues is

¹ Source: <http://www.schuelervz.net//schueler/3/>, accessed Dec. 17th, 2010.

² The researcher who tested schuelerVZ for this assessment used an existing fake account to get ‘inside’ the system.

provided to raise the awareness of users regarding their privacy as well as their safety online. Besides, a child-friendly code of conduct in the form of videos created by users of the SNS is also provided.

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 schuelerVZ provides *clear* guidance and safety information specifically targeted at children and young people on how to navigate their website safely. schuelerVZ also claims to provide useful information/links for parents and teachers.

The self-declaration indicates that schuelerVZ has developed an age-appropriate and clearly formulated internal Code of Conduct in the form of videos (including the consequences of breaching the Terms) especially designed for children and young people. This Code of Conduct specifies, for instance, that “every user who breaches the internal code of conduct gets reprimanded, temporally locked or deleted”. Although no specific information about *what* constitutes inappropriate behaviour on the site is explicitly mentioned in the self-declaration, a link to the internal Code of Conduct (“Verhaltenskodex”) with specific information about what constitutes inappropriate behaviour on the site is provided.

No information on the available technological tools for parents in order to monitor their children is found on the self-declaration, either, although the self-declaration does mention that SchuelerVZ provides phone consultation with educational experts for parents and teachers as well as comprehensive information (targeted at them) regarding the general functioning of the site and specific technical help on each platform.

Main findings in relation to the website

As stated in the self-declaration, SchuelerVZ provides clear and targeted guidance and educational materials designed to give children and young people the tools, knowledge and skills to navigate their services safely. Audio-visual fragments (mainly short videos) are used to explain the safety information. The written text is formatted with sub heads and bullets and presented in short pieces that facilitate information skimming. The provided information is of an accessible and easy-to-understand format for children and young people. However, because of the big variety of the provided information users (specially the youngest ones) might be overwhelmed.

Confirming the analysis of the self-declaration, the Code of Conduct (“Verhaltenskodex”) provides clear information on what constitutes inappropriate behaviour and on the consequences of such behaviour. Misbehaving users can get blocked and/or deleted by schuelerVZ. Besides, very comprehensive documentation regarding not only privacy, but also self-disclosure (e.g. managing their online identity) is provided. For example schuelerVZ advises young users (leaving school) on how to manage and improve their personal information on the SNS profile with regards to applications for part-time jobs and apprenticeships.

SchuelerVZ provides clear and targeted information for parents and teachers on how to foster children’s responsible and safer internet use. Educational materials are provided. External links as well as a contact telephone number for parents and teachers are presented. However,

during the test it remained unclear why the provided telephone number is only meant for parents and teachers and not for users as well³.

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 SchuelerVZ states that the minimum age requirement to create an account in this SNS is 12. Regarding 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), the self-declaration mentions that “profiles of younger persons who get reported will be deleted” and that the “email addresses of deleted users are locked”. However, apart from the fact that under-aged users may be reported, no other mechanisms to identify under-age users are mentioned.

In its self-declaration SchuelerVZ refers to diverse mechanisms through which the service provider ensures limited exposure to potentially inappropriate content and contact for children, for example by being an “invitation-only”⁴ system and by setting a maximum age limit of 21 year olds so as to ensure that children and young people cannot be inappropriately contacted by adults. Furthermore, SchuelerVZ claims to have implemented several measures such as avoiding that users can change their age (although it is not specified how this is achieved); allowing the possibility to restrict content in discussion groups for users who are 16 or older and (temporarily) reprimanding, locking or deleting users who breach Code of Conduct.

The self-declaration does not specify what types of services are considered as not appropriate for children and young people. Besides, it does not refer to the ways in which this service provider promotes the uptake of parental controls in its self-declaration, apart from providing them with safety information (Principle 1).

Main findings in relation to the website

As stated in the self-declaration, SchuelerVZ is an invitation-only system: To register as a user an invitation of an existing user is necessary. In theory, it is not possible to register as a user being younger than the required 12 years. This is realized by a mandatory question about date and year of birth. A person younger than 12 years receives a message that he/she is not allowed to register as a schuelerVZ user because of the age requirements. However, in practice, a younger (and older) person can re-do their registration process and subscribe by simply selecting a suitable date and year of birth.

Confirming the analysis of the self-declaration, because schuelerVZ is aimed at pupils not older than 21 years, all the functionalities and content available on the platform are suited for the 12-21 age group only. Besides, it is not possible for users of schuelerVZ to interact with users of the other VZ-social networking sites or with any other non-registered user of the site.

³ According to schuelerVZ, specially trained staff is responsible for contact with parents and teachers. Thus, it is easier and quicker to handle these contacts through separate contact channels.

⁴ By “invitation-only system” SchuelerVZ means that “people must receive an e-mail invitation sent by an existing schuelerVZ user. It is not possible to register an account without such an invitation.”

Regarding specific commercial content, different advertising banners are displayed on different places within the SNS. Banners advertising inappropriate content such as alcohol or cigarettes were not shown during the test, but only banners displaying well-known brands and companies (e. g. Clearasil, Coca-Cola). None of the banners displayed linked to fake winning notifications or invitations that asked users to provide their contact information.

Supporting the analysis of the self-declaration, no information could be found on schuelerVZ site regarding the functionalities provided to users (or other content providers) to enable them to label/rate or age restrict content, except the possibility for users to set up a discussion group restricted for users younger than 16 years.

Principle 3: Empower users through tools and technology

Main findings in relation to the self-declaration

SchuelerVZ declaration clearly indicates that the profiles of “new registered users are set completely private by default”, i.e. they are unsearchable on search engines and their profiles “are not visible for non registered persons”. But this does not necessarily mean that their profiles are “private by default”⁵ as defined in the Safer Social Networking Principles⁶ because it is not clear from this if “the full profile cannot be viewed or the user contacted except by ‘friends’ on their contact list”.

In relation to the tools and technologies employed by the service provider in order to assist children and young people in managing their experience on their service (particularly with regards to inappropriate or unwanted content/contact), the self-declaration refers to several functionalities including, among others, a “delete button” for every single piece of user-generated content such as posts, photos, message, etc.; “Ignore function” for users who are in trouble with each other or pre-approving of photo tags.

The self-declaration does not provide any further information on how schuelerVZ 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. Although it does provide general safety information targeted at parents and specific guidance about what this SNS is and how it works (see Principle 1).

Main findings in relation to the website

The testing of schuelerVZ demonstrates that the privacy settings are set to “private by default”⁷ as defined in the Safer Social Networking Principles. However, even though the test confirmed that the profiles of minors cannot be searched neither in the internal nor in the external search engines like Google or Yahoo!, it is still possible for “friends of friends” to have access to limited information from those profiles, namely, the profile picture, the first name and the initial of the family name of the minor as well as the name and the city of the school the minor attends. “Friends of friends” cannot interact with the minor although they can send a friend request.

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

⁷ “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”.

Default privacy settings can still be considered as quite secure in the sense that no interactions and no content exchange is allowed to “friends of friends” or beyond. Besides, no contact information is displayed to anyone outside the minor’s approved contact list while only “friends” are able to post comments or pictures to the pinboard (= guestbook). No other user is allowed to tag the user on pictures.

Users can choose one of three basic settings: “access to everybody” (“Profil offen für alle”) (= users can find the profile via an internal search engine and view the whole profile), “access to friends” (“Profil offen für Freunde”) (= users can find the profile via an internal search engine, but only friends and friends of friends can see the whole profile) and “no access” (“Profil geschlossen”) (= users cannot find the profile via the internal search engine, only friends can see the whole profile, other users can only see first name, profile picture and name of the school children attend). In addition to these basic settings, users are able to customize their own privacy settings by deciding which specific profile categories to make available to which users. These categories include “Profile” (“Mein Profil”), “Messages” (“Buschfunk und Nachrichten”), “Search” (“Suche”) and “Diverse” (“Verschiedenes”) which includes the visibility of the online status. It is not possible to pre-approve comments before they are displayed.

Users can block other users from interacting with them via a blacklist (“Ignorieren”). While visiting other users’ profiles, an embedded “ignore” button is displayed. This button is easy to find and use. It is also possible to easily delete undesired pinboard content (via an embedded delete button).

As stated in the analysis of the self-declaration, 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 found on the site.

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 the following mechanisms to report inappropriate content, contact or behaviour on schuelerVZ: easy-to-find and use Reporting Buttons and general reporting via email or online form. According to the self-declaration all types of user-generated content as well as individuals or groups can be reported including discussion groups, pictures, postings, status updates and specific user profiles. The provider claims that reporting links are integrated on *every page* of the site and that especially trained employees screen these reports and “act promptly 365 days a year.”

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.

Main findings in relation to the website

SchuelerVZ provides comprehensive and age-appropriate documentation about how users can report abuse and misbehaviour on the site, mainly via audio-visual fragments. The information, that encourages users to report safety breaches, is easy to find. The employees

who handle the reports are named and users are told that they will help them as soon as possible.

As stated in the self-declaration, two mechanisms to report inappropriate content and misbehaviour are provided: First, users can find embedded report buttons in the profile or next to the content (e. g. pictures, comments on pinboards). Mostly, these buttons are easy to find as they are displayed at prominent places next to user-generated content. However, sometimes these buttons only appear via mouse-over-effect while in other cases the button is permanently displayed. Buttons to report pictures, profiles or discussion groups are always displayed permanently. Buttons to report comments and posts appear via mouse-over-effect (the exclamation mark button). Only the first button for reporting comments or posts is shown permanently on every page.

As the test demonstrates, the report buttons are easy to use. After clicking on them, an online report form appears that asks details about the issue that is being reported. A drop-down list of possible reasons for the report as well as an open text field to describe the problem in more detail is included in the form. The second reporting mechanism, sending an email to report abuse, is less user-friendly, and also less age-appropriate in the sense that young people first have to find the relevant email address. Besides, the contact e-mail address, located in the Terms of Use (“AGB”), is not really easy to find.

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 pinboard of the “victim” and who uploaded some hurtful pictures of the “victim” on their profiles. For some of the bullying content in the pinboard an embedded report button was displayed (exclamation mark button). The “victim” clicked and filled in all the necessary fields and supporting information before sending the form. The test bullying report remained unanswered, the bullying content remained on the site and none of bullies received any warnings or notifications. In sum, we can conclude that the even though the reporting button mechanism provided by SchuelerVZ is user-friendly, it is also ineffective.

Principle 5: Respond to notifications of illegal content or conduct

Main findings in relation to the self-declaration

According to the analysis of the self-declaration the process in place to expeditiously review and remove offending content relies on user-generated reports. Once users contact the support and abuse team (via e-mail or reporting system) these reports are sent to specialized personnel who “screen reports and act promptly”. There are dedicated teams for dealing with requests from parents, teachers, and public authorities and law enforcement agencies. VZnet Netzwerke also cooperates with relevant organizations such as jgedchutz.net and the FSM, which provide hotlines for objectionable conduct or content on the internet. However, it is not clear from the self-declaration what this cooperation concretely involves or if specific info/links to these institutions are provided on the website.

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 schuelerVZ 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. For instance, “substantial and sophisticated privacy settings based on friend lists”, strict default privacy settings, “comprehensive control of personal data”, by filling in a “VCard” for every single application users ensure that their profile data is not transferred to third parties, etc. In the self-declaration the provider also claim that users are given age-appropriate and easy-to-understand information regarding their responsible use of private data and copyrights.

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. Finally, the service provider indicates that users can easily delete their complete profile by clicking on the respective button found in the “my account” section.

Main findings in relation to the website

Confirming the analysis of the self-declaration, schuelerVZ provides a broad range of privacy settings. Users can choose one of three basic settings: “access to everybody” (“Profil offen für alle”), “access to friends” (“Profil offen für Freunde”) and “no access” (“Profil geschlossen”) or create their own privacy settings by means of the categories “Profile” (“Mein Profil”), “Messages” (“Buschfunk und Nachrichten”), “Search” (“Suche”) and “Diverse” (“Verschiedenes”). With this, it is possible to restrict the search for the name (“do not want to be found under my name”). Other examples for the possibilities of privacy options are setting limitations for tagging, presenting the name only via first name, not being recognized as a visitor of other profiles and limiting the possibility for recommendations from other users.

The privacy setting options are easy to use by minors. They are easy to find and can be viewed and/or changed at any given time. Supporting information on how to use these settings is also provided in clear and age-appropriate language. This information also alerts schuelerVZ users on the types of information that third party application providers might retain from them. In sum, SchuelerVZ provides plenty of age-appropriate materials to support users make informed decisions regarding the personal information they disclose online. Some of the sections where users can find relevant information regarding privacy are “Advices” (“Tipps & Hinweise”); “Impression management & privacy” (“Selbstdarstellung & Privatsphäre”) and “Plain texts” (“Klartexte”) which are personalised safety tips from schuelerVZ employees (e. g. “Trust in the net” (“Vertrauen im Netz”) or “Data protection” (“Datenschutz”)).

Finally, the test also confirmed that users of schuelerVZ can easily delete their account. An easy to find and use button in the section “My Account” (“Mein Account”) is provided. It is clearly explained that some disclosed information (comments on pinboards and pictures) should be deleted first. Pictures in photo albums of others that show the user who wants to leave schuelerVZ can be reported for deleting.

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 SchuelerVZ assesses their service to identify potential risks to children and young people by... Employed educationists are evaluating entire communication and safety education” and “Every application is reviewed for legal and technical aspects in an approval process.”

According to the self-declaration, the procedures employed by schuelerVZ to promote compliance with the Terms of Service are based on the user-generated report mechanism by means of which objectionable conduct or content can be identified. Users who breach the code of conduct can either be temporarily reprimanded, locked or deleted, while content which is found to breach the internal code of conduct is deleted.

Regarding the measures steps taken by schuelerVZ to minimize the risk of employing candidates who may be unsuited for work which involves real-time contact with children or young people, the self-declaration stresses that “Trained employees with different skills for special topics are working in teams 365 days a year to screen reports and act promptly”. Finally, it is not clear from the self-declaration how the service provider assesses the effectiveness of their services to identify potential safety threats.

Principle 7 was not tested in the website.

Summary of Results and Conclusions

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

- 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 were found on the site.
- Even though the reporting button mechanism provided by SchuelerVZ is user-friendly, it is also ineffective. Users get neither an acknowledgement that their message would be handled nor any reply from the provider. Besides, the offending content was not removed from the site and the “bullies” did not get any warning nor were they “reprimanded” in any way.

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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